



U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Administration on Children, Youth and Families
Children's Bureau

Child and Family Services Review Summary of Findings

OKLAHOMA

**U.S. Department of Health and Human Services
Administration for Children and Families
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EXECUTIVE SUMMARY

The Child and Family Services Review (CFSR) assesses State performance during a specified time period with respect to seven child welfare outcomes in the areas of safety, permanency, and well-being and with respect to seven systemic factors. The assessment is based on information from the following sources:

- The Statewide Assessment prepared by the State child welfare agency – the Oklahoma Department of Human Services (DHS), Child and Family Services Division;
- The State Data Profile prepared by the Children’s Bureau of the U.S. Department of Health and Human Services;
- Reviews of 50 case records at three sites throughout the State; and
- Interviews or focus groups (conducted at all three sites) with local- and State-level stakeholders including children, parents, foster parents, all levels of child welfare agency personnel, collaborating agency personnel, school personnel, mental health providers, court personnel, legislators, and attorneys.

The Oklahoma DHS did not achieve substantial conformity with the seven safety, permanency, and well-being outcomes. The State also did not meet national standards for measures relating to the recurrence of maltreatment, maltreatment in foster care, re-entries into foster care, length of time to achieve adoption, and stability of foster care placements. The most significant concern with regard to the outcomes is the timely achievement of permanency for children in foster care, with the exception of achieving reunification, as measured in the first permanency outcome. The State achieved substantial conformity on five of the seven systemic factors (statewide information system, quality assurance system, training, agency responsiveness to the community, and foster and adoptive parent licensing, recruitment, and retention), but was not in substantial conformity on the remaining two factors (case review system and service array). The primary concerns in these two systemic areas were inconsistencies in meeting requirements that case plans be developed jointly with parents, holding permanency hearings for children in foster care, notifying foster and pre-adoptive parents of hearings and reviews, and assuring that services are accessible to the children and families who need them.

The CFSR process identified several areas needing improvement. One of the areas of particular concern focused on the barriers related to establishing the goal of adoption and achieving termination of parental rights (TPR). The most frequently identified barrier to timely adoptions was that parents have the right to a jury trial in both adjudication and TPR hearings. Consequently, jury trials at adjudication often overwhelm court dockets and result in delayed adjudication, slowing down the process for reunification and adoptions. The State is proposing legislation to change the jury trial option. Another area of concern, reported in the statewide assessment, was the inconsistency across the State with regard to courts holding permanency hearings every 12 months. Data from KIDS indicated that less than one percent of the children in out-of-home placement have had a permanency hearing as per statute; and 73 percent of the children have no information entered into KIDS regarding a permanency hearing. The agency has been unable to determine whether the cause is poor data entry, to the fact that no permanency hearing has been held, or a lack of court documentation of a permanency hearing having

been held. In addition, the State's notification process is inadequate when a review or hearing is being held with respect to the child. The statewide assessment indicated that notification of foster care, preadoptive parents and relative caregivers of reviews or hearings was found to not be occurring on a consistent basis, and that there was no consistency with regard to the opportunity for these caregivers to be heard in court. Tribal stakeholders indicated a similar concern regarding notification of reviews and hearings from both DHS and the courts.

Another area needing improvement was the consistency of service availability on a statewide basis. Although the array of child protective, permanency planning, and adoption services are provided in all county child welfare agency field offices, Oklahoma is largely a rural State, and, as a result, families residing in rural areas are dependent upon transportation to larger metropolitan areas for many of these services. In addition, many rural areas cannot recruit professional mental health and medical staff willing to relocate to their areas. Stakeholders identified several service gaps in rural areas, i.e., transportation issues, and long waiting lists to obtain limited services for mental health and residential treatment services. We also found that the State did not always provide individualized services to families, particularly in-home services cases as required by DHS policy. Results of the case records reviewed found that families were not involved in the development of their case plans or treatment plans, and in many cases the service availability appeared to drive the treatment plan rather than the reverse.

The State did meet the national standard for reunifications occurring within 12 months of entry into foster care. In addition, several items assessed under the seven outcomes were rated as a strength. This included the following:

- Providing services to families to protect children in their homes and prevent removal (item 3).
- Implementing diligent efforts to achieve reunification, guardianship, permanent placement with relatives (item 8) or to assist children in achieving self-sufficient independent living if they are emancipated from the system (item 10).
- Placing children in close proximity to their biological families (item 11) and with their siblings (item 12) when possible and in the children's best interest.
- Facilitating visitation of children in foster care with parents and siblings (item 13) and supporting the maintenance of the bond between children and their parents (item 16).

The CFSR assessment process identified several strengths for the Oklahoma DHS. One clear strength observed was the extensive commitment of DHS to assessing and improving the outcomes experienced by children and families served by the child welfare system throughout the State. Evidence pertaining to the high level of commitment of DHS to an ongoing assessment of outcomes was apparent from the following observations:

- The implementation of Statewide comprehensive and intensive quality assurance effort focusing on children's outcomes as well as compliance with State policies.

- The expenditure of resources on methodologically appropriate evaluations of the effectiveness of child welfare agency services conducted by third-party evaluators, and the willingness to respond appropriately if evaluation findings do not support service efficacy.
- The recently implemented programs and initiatives designed to enhance attainment of positive outcomes for children including, but not limited to, the Swift Adoption Program, the Transitions Unit initiative, and the Family Group Conferencing pilot program.
- The high quality of the DHS Child Welfare Information System (called KIDS), which in addition to supporting a variety of agency functions, includes elements that relate to children's outcomes to promote the production of outcome-focused management reports.

Another strength observed concerns DHS' efforts to work closely with the many Indian Nations and Tribal child welfare agencies throughout the State. Native Americans represent nearly eight percent of Oklahoma's population and are the largest non-white population group. Tribes may elect to exercise jurisdiction over the child of an enrolled member at any point in a case but frequently choose to allow DHS to serve as a primary provider of protective and treatment services. Therefore, Indian children can be either served exclusively by the Tribe or by DHS with various levels of tribal oversight and support. Currently, there are 2,013 Indian Children in DHS custody. For example, during the case review, it was observed that for the Native American children in foster care, DHS involved the Tribe in the cases immediately and children were placed with either a relative or a tribal family. Although stakeholders in both DHS and Tribal agencies indicated that problems have occurred, and continue to occur, particularly at local levels, most stakeholders agreed that DHS listens to the issues raised by the Tribes and attempts to address those issues as quickly as possible.

The assessment also identified other systemic strengths for DHS, particularly its high quality training programs for staff, both basic and ongoing training; its reaching out to the community for input into planning and program development; and its standards and recruitment efforts with respect to foster and adoptive homes.

The following is a summary of the CFSR findings with respect to outcomes and systemic factors.

KEY FINDINGS RELATED TO OUTCOMES

SAFETY

Outcome S1: Children are, first and foremost, protected from abuse and neglect.

Status of Safety Outcome S1

Oklahoma did not achieve substantial conformity for Safety Outcome 1. This determination was based on the following findings:

- 80 percent of the case records reviewed were rated as having substantially achieved this outcome, which is less than the 90 percent required for an overall rating of substantial conformity;
- The State did not meet the national standard for the percentages of children experiencing more than one substantiated or indicated child maltreatment report within a 6 month period; and
- The State did not meet the national standard for the percentages of children experiencing maltreatment from caretakers while in foster care.

A summary of the findings for specific items assessed under this outcome is presented below.

Item 1. Timeliness of initiating investigations of reports of child maltreatment

Item 1 was assigned an overall rating of Area Needing Improvement based on the finding that in 30 percent of the applicable cases, the agency did not respond to a maltreatment report in a timely manner. Information the Statewide Assessment and stakeholder interviews suggests that the agency is consistent in responding to Priority I (highest risk) reports in a timely manner, but that there are inconsistencies in the timeliness of responses to reports assigned to lower priority areas. This problem was attributed by stakeholders to the high level of staff turnover among the child welfare agency's front-line workers, which results in both inexperienced staff and excessive staff caseloads.

Item 2. Repeat maltreatment

Item 2 was assigned an overall rating of Area Needing Improvement based on the following:

In 18 of the cases in which children experienced a maltreatment report during the period under review, 28 percent had experienced another substantiated or indicated maltreatment report within a 6-month period.

The State Data Profile indicated that in 2000, the incidence of repeat maltreatment within a 6-month period was 11.7 percent, which does not meet the national standard of 6.1 percent.

Outcome S2: Children are safely maintained in their homes whenever possible and appropriate.

Status of Safety Outcome S2

Oklahoma did not achieve substantial conformity with Safety Outcome 2. This determination was based on the finding that the outcome was substantially achieved in 81.7 percent of the case records reviewed, which is less than the 90 percent required for a rating of substantial conformity. A summary of findings of the specific items assessed relevant to this outcome is presented below.

Item 3. Services to family to protect child(ren) in home and prevent removal

Item 3 was assigned an overall rating of Strength because in 88 percent of the cases, reviewers determined that the agency had made diligent efforts to provide services to ensure children's safety while preventing their placement in foster care.

Item 4. Risk of harm to child

Item 4 was assigned an overall rating of Area Needing Improvement because in 17 percent of the applicable cases, reviewers determined that DHS was not effective in its efforts to reduce risk of harm to children. A key finding was that although the agency is extremely effective in managing risk by removing children from their homes when it is appropriate, it is less effective in managing risk when children remain at home. DHS acknowledged this problem in the Statewide Assessment and indicated that it is in the process of redesigning its preventive services programs throughout the State based on models that have been proven effective through methodologically sound evaluations.

II. PERMANENCY

Outcome P1: Children have permanency and stability in their living situations.

Status of Permanency Outcome P1

Oklahoma did not achieve substantial conformity with Permanency Outcome 1 based on the following findings:

- 64 percent of the case records were rated as having substantially achieved Permanency Outcome 1, which is less than the 90 percent required for an overall rating of substantial conformity.
- The State Data Profile indicated that in 2000, the percentage of children entering foster care who were re-entering care within 12 months of discharge from a prior episode was 15.3, which is greater than the national standard of 8.6 percent.
- The State Data Profile indicated that in 2000, the percentage of children experiencing no more than two placements during their first 12 months in foster care was 75.9, which is less than the national standard of 86.7.
- The State Data Profile indicated that in 2000, the percentage of children who experienced a finalized adoption within 24 months of removal from home was 31.3, although very close, was less than the national standard of 32.

A summary of findings of the specific items assessed relevant to this outcome is presented below.

Item 5. Foster care re-entries

This item was assigned an overall rating of Area Needing Improvement because (1) 17 percent of the children who entered foster care during the period under review were re-entering care within 12 months of discharge from a prior foster care episode, and (2) the data reported in the State Data Profile indicate that the rate of re-entry into foster care within 12 months is 15.3 percent, which does not

meet the national standard of 8.6 percent. DHS administrators indicated that there may be some inaccuracies in the data provided in the State Data Profile due to the way the State interprets particular data elements in the Adoption and Foster Care Analysis Reporting System (AFCARS). The administrators noted that DHS is currently in the process of examining and resolving potential data reporting discrepancies.

Item 6. Stability of foster care placement

Item 6 was rated as an Area Needing Improvement because: (1) data from the State Data Profile indicate that 75.9 percent of all children in foster care for 12 months or less had no more than two placement settings, which does not meet the national standard of 86.7 percent; and (2) the item was rated as an Area Needing Improvement in 40 percent of the 25 foster care cases reviewed. A key problem observed with respect to this item was the use of shelter care as the first placement for the majority of children coming into foster care. DHS maintains that this placement is necessary to allow the agency to assess the child's needs so that an appropriate match can be made with a foster family.

Item 7. Permanency goal for child

Item 7 was assigned an overall rating of Area Needing Improvement because in 20 percent of the applicable cases, reviewers determined that the agency had not established an appropriate goal for the child in a timely manner. However, this problem occurred primarily with respect to children with a goal of adoption who had been in foster care for a long time before the goal of adoption was established. For most of the cases in which children had a goal of reunification, the goal was deemed to be appropriate and to have been established in a timely manner.

Item 8. Reunification, Guardianship or Permanent Placement with Relatives

Item 8 was assigned an overall rating of Strength because: (1) data from the State Data Profile indicate that the State's percentage for reunifications occurring within 12 months of entry into foster care (80.2%) meets the national standard of 76.2 percent, and (2) in 85 percent of the case records reviewed, reviewers determined that the agency had made, or was making, diligent efforts to attain permanency for children with goals of reunification, permanent placement with relatives, or guardianship.

Item 9. Adoption

Item 9 was assigned an overall rating of Area Needing Improvement because: (1) in 55 percent of the applicable cases, reviewers determined that DHS had not made diligent efforts to achieve adoptions in a timely manner, and (2) data from the State Data Profile indicate that the percentage of finalized adoptions in FY 2000 occurring within 24 months of removal from home (31.3%) did not meet the national standard of 32 percent. Some of the barriers to timely adoptions were the following: (1) the high level of turnover in caseworkers, (2) the practice of some agency workers of maintaining a goal of reunification even when there is no evidence that

parents are working on their treatment plans, and (3) the fact that Oklahoma statute allows parents to have a jury trial at both the adjudication and TPR hearings.

Item 10. Permanency goal of other planned permanent living arrangement

Item 10 was assigned an overall rating of Strength because in both applicable cases, reviewers determined that the goal was appropriate for the child and that DHS workers were in the process of helping the child attain that goal. The small number of cases for which long term foster care was actually a goal is consistent with DHS policy that reunification and adoption are the primary permanency goals.

Outcome P2: The continuity of family relationships and connections is preserved for children.

Status of Permanency Outcome P2

Oklahoma did not achieve substantial conformity with Permanency Outcome 2. This determination was based on the finding that the outcome was rated as substantially achieved in 84 percent of the cases, which is less than the 90 percent required for substantial conformity. A summary of findings for specific items assessed relevant to this outcome is presented below.

Item 11. Proximity of foster care placement

Item 11 was assigned an overall rating of Strength because in all applicable cases, children were placed in close proximity to parents or close relatives.

Item 12. Placement with siblings

Item 12 was assigned an overall rating of Strength because in 95 percent of the cases, siblings were either placed together, or reviewers determined that their separation was necessary to meet the needs of one or more of the siblings.

Item 13. Visiting with parents and siblings in foster care

Item 13 was assigned an overall rating of Strength because in 90 percent of the applicable case records, reviewers determined that DHS had made, and was making, concerted efforts to facilitate visitation. In most cases, visitation occurred on at least a monthly basis with mothers, fathers, and siblings.

Item 14. Preserving connections

Item 14 was assigned an overall rating of Area Needing Improvement because in 17 percent of the cases, reviewers determined that children's connections to family, community, culture, faith, and friends had not been preserved while the child was in foster care.

However, reviewers noted that for Native American children in foster care, the agency had been effective in preserving children's connections. In these cases, the Tribe had been involved in the case immediately and placements were made with either a relative or a tribal family. As of October 2001, there were 449 tribal homes identified by the State's SACWIS (KIDS system) to serve Indian custody children who represent approximately 22 percent of the average daily population of children in foster care. There is not an accurate measurement available as to how many of those homes are relative or same Tribe placement.

Item 15. Relative placement

Item 15 was assigned an overall rating of Area Needing Improvement because reviewers determined that in 28 percent of the cases, the agency had not made diligent efforts to locate and assess relatives as potential placement resources. The key finding was that the agency was consistent and effective in exploring maternal relatives, but that paternal relatives were not sought as consistently.

Item 16. Relationship of child in care with parents

Item 16 was assigned an overall rating of Strength because reviewers determined that in all applicable cases, the agency was supporting the relationships of children in foster care with their parents.

III. CHILD AND FAMILY WELL-BEING

Outcome WB1: Families have enhanced capacity to provide for their children's needs.

Status of Well-Being Outcome WB1

Oklahoma did not achieve substantial conformity with Well-Being Outcome 1. This determination was based on the finding that the outcome was rated as substantially achieved for 70 percent of the case records reviewed, which is less than the 90 percent required for a determination of substantial conformity. A summary of findings for specific items relevant to this outcome is presented below.

Item 17. Needs and services of child, parents, foster parents

Item 17 was assigned an overall rating of Area Needing Improvement because in 22 percent of the cases, reviewers determined that the needs and services of children, parents, and/or foster parents had not been, or were not being, adequately addressed by DHS. This finding reflects an inconsistency in practice rather than typifying the agency's casework practice. A primary concern identified was the lack of consistency among workers in providing fathers with adequate attention with respect to their service needs.

Item 18. Child and family involvement in case planning

Item 18 was assigned an overall rating of Area Needing Improvement based on the finding that in 40 percent of the applicable case records, reviewers determined that DHS had not appropriately involved parents or children in the case planning process. Although DHS policy requires that parents be involved in the assessment and treatment planning process, the case review process indicated that this policy is not implemented on a consistent basis.

Item 19. Worker visits with child

Item 19 was assigned an overall rating of Area Needing Improvement because in 18 percent of the case records, reviewers determined that the quantity and quality of caseworker visits with children were not sufficient to adequately monitor the child's safety and well-being. Although in the majority of cases workers were diligent with regard to visiting children and monitoring their safety and well-being, this was not a consistent practice across cases.

Item 20. Worker visits with parents

This item was assigned an overall rating of Area Needing Improvement because in 22 percent of the applicable case records, reviewers determined that visits with parents were not sufficiently frequent or of sufficient quality to promote the safety and well-being of the child or increase movement toward permanency for the child. Despite this rating, there were many cases in which workers visited parents more frequently than required by DHS policy and were diligent in addressing case-related issues during all visits.

Outcome WB2: Children receive appropriate services to meet their educational needs.

Status of Well-Being Outcome WB2

Oklahoma did not achieve substantial conformity with Well-Being Outcome 2 because 81 percent of the case records reviewed were found to have substantially achieved this outcome, which is less than the 90 percent required for substantial conformity. A summary of findings of the specific items assessed relevant to this outcome is presented below.

Item 21. Educational needs of the child.

Item 21 was assigned an overall rating of Area Needing Improvement because for 19 percent of the cases, reviewers determined that the educational needs of children were not effectively and appropriately addressed. This finding reflects inconsistencies in practice rather than representing typical cases. In most of the cases, children educational needs were appropriately addressed through service provision and advocacy.

Outcome WB3: Children receive adequate services to meet their physical and mental health needs.

Status Of Well-Being Outcome 3

Oklahoma did not achieve substantial conformity with Well-Being Outcome 3 because the outcome was rated as substantially achieved in 71 percent of the applicable cases, which is less than the 90 percent required for a determination of substantial conformity. A summary of findings for specific items assessed as relevant to this outcome is presented below.

Item 22. Physical health of the child

Item 22 was assigned an overall rating of Area Needing Improvement based on the finding that in 23 percent of the applicable case records, reviewers determined that DHS was not adequately addressing the health needs of children in both foster care and in-home services cases.

Item 23. Mental health of the child

Item 23 was assigned an overall rating of Area Needing Improvement because in 26 percent of the applicable cases, reviewers determined that DHS was not addressing children's mental health needs in an effective manner. For these cases, the agency either did not conduct a mental health assessment when there was an indication that one was needed, or they conducted an assessment, but did not follow up with services based on the findings of the assessment. In most cases, DHS caseworkers were diligent in ensuring that children's mental health needs were met.

KEY FINDINGS RELATING TO SYSTEMIC FACTORS

IV. STATEWIDE INFORMATION SYSTEM

Status of Statewide Information System

Oklahoma is in substantial conformity with this systemic factor.

Item 24. The State is operating a Statewide information system that, at a minimum, can readily identify the status, demographic characteristics, location, and goals for the placement of every child who is (or within the immediately preceding 12 months, has been) in foster care.

This item was rated as a Strength because Oklahoma's automated child welfare system (SACWIS) – KIDS – has been implemented Statewide and can identify the status, demographic characteristics, location, and goals for the placement of every child who is

currently, or has recently been, in foster care. KIDS was implemented Statewide in 1995 and is one of only four State systems that has passed the SACWIS Statewide Assessment Review (SAR) requirements. KIDS also interfaces with Child Support, Eligibility, Financial Management and Juvenile Justice programs.

V. CASE REVIEW SYSTEM

Status of Case Review System

Oklahoma is not in substantial conformity with this systemic factor.

Item 25. Provides a process that ensures that each child has a written case plan to be developed jointly with the child's parent(s) that includes the required provisions.

Item 25 was rated as an Area Needing Improvement because although case plans are routinely developed for children, the involvement of parents (particularly fathers) in this process is not consistent.

Item 26. Provides a process for the periodic review of the status of each child, no less frequently than once every 6 months, either by a court or by administrative review.

This item was rated as a Strength because the State has established a number of procedures to ensure a review of the status of each child in foster care every 6 months. The most common procedure is the Permanency Planning Review (PPR). DHS policy requires that the PPR must take place every 6 months for as long as a child remains in out of home care.

Item 27. Provides a process that ensures that each child in foster care under the supervision of the State has a permanency hearing in a qualified court or administrative body no later than 12 months from the date the child entered foster care and no less frequently than every 12 months thereafter.

This item was assigned a rating of Area Needing Improvement because of the inconsistency across the State with regard to courts holding permanency hearings every 12 months. However, some stakeholders suggested that permanency hearings are being held, but because the hearings are not formal, and no court minutes are provided, the court may not be documenting them.

Item 28. Provides a process for termination of parental rights proceedings in accordance with the provisions of the Adoption and Safe Families Act.

This item was assigned a rating of Strength because Oklahoma State statute and DHS rules comply with the ASFA requirement for filing TPR petitions within 15 of 22 months, unless one of the three exceptions is requested.

Item 29. Provides a process for foster parents, preadoptive parents, and relative caregivers of children in foster care to be notified of, and have an opportunity to be heard in, any review or hearing held with respect to the child.

This item was assigned a rating of Area Needing Improvement because notification of hearings to foster parents, preadoptive parents and relative caregivers was not occurring consistently, and there was variation across jurisdictions regarding the willingness of judges to provide an opportunity for these caregivers to be heard in court. Tribal representatives also indicated that provision of notice to Indian families by both DHS and the Courts is inconsistent.

VI. QUALITY ASSURANCE SYSTEM

Status of Quality Assurance System

Oklahoma is in substantial conformity with this systemic factor.

Item 30. The State has developed and implemented standards to ensure that children in foster care are provided quality services that protect the safety and health of the children.

This item was rated as a Strength because DHS has developed standards to ensure that children in foster care are provided quality services that protect the safety and health of children.

Item 31. The State is operating an identifiable quality assurance system that is in place in the jurisdictions where the services included in the CFSP are provided, evaluates the quality of services, identifies strengths and needs of the service delivery system, provides relevant reports, and evaluates program improvement measures implemented.

This item was rated a Strength because the State operates a quality assurance system that is comprehensive and meets all of the requirements stated in the item. In January 2001, DHS implemented a statewide quality improvement system incorporating many features of the Federal CFSR process. The State has integrated these CFSR outcomes into goals constituting the State's title IV-B, Child and Family Services Plan. The Annual Program and Services Report includes a critical evaluation of performance in the context of goals as well as strategies for ongoing service improvement.

VII. TRAINING

Status of Training

Oklahoma is in substantial conformity with this systemic factor.

Item 32. The State is operating a staff development and training program that supports the goals and objectives in the CFSP, addresses services provided under titles IV-B and IV-E, and provides initial training for all staff who deliver these services.

Item 32 was rated as a Strength because DHS operates a staff development and training program that supports the goals and objectives in the CFSP, addresses services provided under titles IV-B and IV-E, and provides initial training for all staff who deliver these services.

Item 33. The State provides for ongoing training for staff that addresses the skills and knowledge base needed to carry out their duties with regard to the services included in the CFSP.

Item 33 was rated as a Strength because DHS provides numerous opportunities for ongoing training that addressed the skills and knowledge base needed by staff to carry out their jobs and mandates ongoing training for all caseworkers.

Item 34. The State provides training for current or prospective foster parents, adoptive parents, and staff of State licensed or approved facilities that care for children receiving foster care or adoption assistance under title IV-E that addresses the skills and knowledge base needed to carry out their duties with regard to foster and adopted children.

Item 34 was rated as a Strength because DHS policy and/or contractual agreements require foster and kinship applicants to complete 21 hours of the Oklahoma PATH (Parents as Tender Healers) curriculum and 6 hours of Behavior Crisis Management Training (BCMT). For continued certification, 12 hours of in-service training are required per contract year. Both training programs are managed through a contract with the National Resource Center for Youth Services.

VIII. SERVICE ARRAY

Status of Service Array

Oklahoma is not in substantial conformity with this systemic factor.

Item 35. The State has in place an array of services that assess the strengths and needs of children and families and determine other service needs, address the needs of families in addition to individual children in order to create a safe home environment, enable children to remain safely with their parents when reasonable, and help children in foster and adoptive placements achieve permanency.

Item 35 was rated as a Strength because the State has available and in place an array of services that assess the strengths and needs of children and families and determine additional services needs. DHS provides many services directly, such as casework services,

family support, emergency shelter, and placement services. Placement services include emergency foster care, therapeutic foster care, and in-patient and residential treatment. DHS also purchases a number of services for the children in DHS custody and their parents.

Item 36. The services in item 35 are accessible to families and children in all political jurisdictions covered in the State's CFSP.

This item was rated as an Area Needing Improvement because there is a wide variation across the State with respect to the availability of key services to children and families. In many rural communities, families must travel long distances to metropolitan areas to receive services.

Item 37. The services in item 35 can be individualized to meet the unique needs of children and families served by the agency.

This item was rated as an Area Needing Improvement because the State did not always provide individualized services to families, particularly in in-home services cases, as required by DHS policy. A large percentage of the case records reviewed revealed that families were not involved in the development of their case plans or treatment plans, and in many cases the service availability appeared to drive the treatment plan rather than the reverse.

IX. AGENCY RESPONSIVENESS TO THE COMMUNITY

Status of Agency Responsiveness to the Community

Oklahoma is in substantial conformity with this systemic factor.

Item 38. In implementing the provisions of the CFSP, the State engages in ongoing consultation with tribal representatives, consumers, service providers, foster care providers, the juvenile court, and other public and private child- and family-serving agencies and includes the major concerns of these representatives in the goals and objectives of the CFSP.

This item has been rated as a Strength because the State engages in extensive consultation with tribal representatives, consumers, service providers, foster care providers, the juvenile court and other relevant public and private agencies in developing and establishing the goals and objectives of the CFSP.

Item 39. The agency develops, in consultation with these representatives, annual reports of progress and services delivered pursuant to the CFSP.

This item was rated as a Strength because the State-administered CFSR process uses consultation with the community representatives to inform annual reports of progress and services delivered under the CFSP. Similarly, DHS has established a Child and Family

Services Committee that is used to ensure that input from other stakeholders in the community is ongoing and informs the development of reports.

Item 40. The State's services under the CFSP are coordinated with services or benefits of other Federal or federally assisted programs serving the same population.

This item was rated as a Strength because DHS participates with other public and private agencies as an integral part of planning, developing and coordinating services. DHS participates in wide range of councils and organizations in the community and partners with a variety of agencies, including the Casey Family Program, Oklahoma City Division, the Oklahoma State Department of Health (OSDH), One Church, One Child of Oklahoma, and the Office of Juvenile Affairs (OJA).

X. FOSTER AND ADOPTIVE PARENT LICENSING, RECRUITMENT, AND RETENTION

Status of Foster and Adoptive Parent Licensing, Recruitment, and Retention

Oklahoma is in substantial conformity with this systemic factor.

Item 41. The State has implemented standards for foster family homes and child care institutions, which are reasonably in accord with recommended national standards.

Item 41 was rated as a Strength because the State has implemented standards for foster family homes and child care institutions that are reasonably in accord with recommended national standards. Standards for foster family homes are established through State statutes and the Children and Family Services Division's rules. Since September 2000, the Department's policy has required kinship care applicants and providers, paid and non-paid, to meet the same requirements as foster care applicants and providers.

Item 42. The standards are applied to all licensed or approved foster family homes or childcare institutions receiving title IV-E or IV-B funds.

This item was rated as a Strength because the standards are applied to all licensed or approved foster family homes (both relative foster homes and non-relative foster homes) or child care institutions receiving title IV-E or IV-B funds, with the exception of homes approved by the Tribes, which establish their own standards for tribal foster homes. The State Tribal Coordinator monitors services provided by the various Tribes, but tribal foster homes are approved independent of DHS. Specific information as to the differences between State and Tribal approval standards was not determined as a result of the review or Statewide Assessment.

Item 43. The State complies with Federal requirements for criminal background clearances as related to licensing or approving foster care and adoptive placements and has in place a case planning process that includes provisions for addressing the safety of foster care and adoptive placements for children.

Item 43 was rated as a Strength because State statute requires that DHS or a child-placing agency shall not place a child with a foster or adoptive parent who has been convicted of any of these felony offenses: physical assault, battery or a drug-related offense in the 5 year period prior to the application date; child abuse or neglect; domestic abuse; a crime against a child, including, but not limited to, child pornography; or, a crime involving violence, including, but not limited to, rape, sexual assault or homicide, but excluding physical assault or battery.

Item 44. The State has in place a process for ensuring the diligent recruitment of potential foster and adoptive families that reflect the ethnic and racial diversity of children in the State for whom foster and adoptive homes are needed.

This item was rated as a Strength because the State has a process for recruiting potential foster and adoptive families and attempts to recruit families that reflect the ethnic and racial diversity of children in the State for whom foster and adoptive homes are needed.

Item 45. The State has in place a process for the effective use of cross-jurisdictional resources to facilitate timely adoptive or permanent placements for waiting children.

This item was rated as a Strength because according to the Statewide Assessment, Oklahoma's adoption program has historically placed children in adoptive homes Statewide. Families from out of State with approved home assessments are encouraged to send a copy of their current approved assessment to the State office. The assessment is then forwarded to the child's worker for consideration. DHS contracts out the administration of adoption ICPC services. DHS contracts with licensed child placement agencies in receiving States for supervision of adoptive placements.

INTRODUCTION

This document presents the findings of the Child and Family Services Review (CFSR) for the State of Oklahoma. The findings were derived from the following documents and data collection procedures:

- The Statewide Assessment prepared by the State child welfare agency – the Oklahoma Department of Human Services (DHS), Child and Family Services Division (CFSD).
- The State Data Profile prepared by the Children’s Bureau of the U.S. Department of Health and Human Services;
- Reviews of 50 case records at three sites throughout the State; and
- Interviews or focus groups (conducted at all three sites) with local and state level stakeholders including children, parents, foster parents, all levels of child welfare agency personnel, collaborating agency personnel, school personnel, mental health providers, court personnel, legislators, and attorneys.

The key characteristics of the 50 case records reviewed are the following:

- 26 cases were reviewed in Oklahoma County, 12 in Cherokee County, and 12 in Pottawatomie County (Shawnee).
- All 50 cases had been open cases at some time during the period under review;
- 25 of the cases were “foster care cases” (cases in which children were in the care and custody of the State child welfare agency and in an out-of-home placement at some time during the period under review), and 25 were “in-home services cases” (cases in which families received services from the child welfare agency while children remained in their homes).
- Of the 25 in-home services cases, 15 were “aftercare cases” (cases in which children had been reunified with caretakers but, in accordance with State Statute, the State child welfare agency retained supervision for a period of 12 months following the reunification in order to provide follow-up to the families), and 10 were preventive services cases (cases in which services were provided to ensure children’s safety and reduce risk of future harm while children remain in their homes).
- In 24 of the cases, all children in the family were Caucasian; in 13 cases, all children in the family were African American; in 11 cases, all children in the family were Native American; and in 1 case, the children were Native American/Caucasian. In one case, reviewers did not identify the race/ethnicity of the children.
- Of the 50 case records reviewed, the **primary** reason for the opening of a child welfare agency case was the following:
 - Neglect (not including medical neglect) – 19 cases (38%)
 - Substance abuse by parent – 10 cases (20%)
 - Physical abuse – 7 cases (14%)
 - Abandonment – 4 cases (8%)
 - Sexual abuse – 2 cases (4%)

- Domestic violence in child's home – 1 case (2%)
- Mental/physical health of parent – 1 case (2%)
- Child's behavior – 1 case (2%)
- Other – 4 cases (8%)
- Among **all** reasons identified for children coming to the attention of the child welfare agency, neglect (not including medical neglect) was cited in 36 (72%) cases, substance abuse by parents was cited in 24 (48%) cases, physical abuse was cited in 19 (38%) cases, and medical neglect was cited in 13 cases.
- For 19 of the 25 foster care cases, the children entered foster care prior to the period under review and remained in foster care during the entire period under review.

The first section of the report presents the CFSR findings relevant to the State's performance in achieving specific outcomes for children in the areas of safety, permanency, and well-being. For each outcome, there is a table providing the degree of outcome achievement by site, a presentation of the State's status with regard to substantial conformity with the outcome, and a discussion of each item assessed as part of the overall outcome assessment. The second section of the report provides an assessment and discussion of the systemic factors relevant to the child welfare agency's ability to achieve positive outcomes for children.

SECTION 1: OUTCOMES

I. SAFETY

Safety Outcome 1

Outcome S1: Children are, first and foremost, protected from abuse and neglect.					
Number of cases reviewed by the team according to degree of outcome achievement:					
	Cherokee	Oklahoma	Pottawatomie	Total Number	Total Percentage
Substantially Achieved:	10	20	10	40	80.0
Partially Achieved:	2	5	2	9	18.0
Not Achieved or Addressed:	0	1	0	1	2.0
Not Applicable:					
Conformity of Statewide data indicators with national standards:					
	National Standard	State's Percentage	Meets Standard	Does Not Meet Standard	
Repeat maltreatment	6.1%	11.7%		X	
Maltreatment of children in foster care	0.57%	1.27%		X	

STATUS OF SAFETY OUTCOME 1

Oklahoma did not achieve substantial conformity for Safety Outcome 1. This determination was based on the following findings:

- Only 80 percent of the case records reviewed were rated as having substantially achieved this outcome, which is less than the 90 percent required for an overall rating of substantial conformity;
- The State did not meet the national standard for the percentages of children experiencing more than one substantiated or indicated child maltreatment report within a 6 month period; and
- The State did not meet the national standard for the percentages of children experiencing maltreatment from caretakers while in foster care.

The findings from the assessment of Safety Outcome 1 suggest that although the Oklahoma DHS exhibits several strengths with respect to protecting children from abuse and neglect, the agency was not consistently effective in attaining this outcome for children during the period under review. The primary strength observed is that the agency makes immediate and appropriate responses to reports of child maltreatment that are considered to be high-risk reports (i.e., Priority I reports). However, the response time for child maltreatment reports that are assigned to a lower priority level is not always in compliance with DHS policy. The assessment of this outcome also revealed that repeat maltreatment is a concern for the agency. Stakeholders attributed both the response time problems and repeat maltreatment to the high level of turnover among child welfare agency staff, particularly those staff responsible for conducting investigations and assessments. According to stakeholders, high levels of staff turnover result in many DHS units being manned by inexperienced staff with excessive caseloads.

The findings pertaining to the specific items assessed under Safety Outcome 1 are presented below.

Item 1: Timeliness of initiating investigations of reports of child maltreatment

☐ Strength ☒ Area Needing Improvement

Review Findings: The assessment of item 1 was applicable for 20 of the 50 case records. Thirty case records were not applicable because they did not involve reports of child maltreatment during the period under review. In assessing item 1, reviewers were to determine whether the response to a maltreatment report occurring during the period under review had been initiated in accordance with child welfare agency policy. In Oklahoma, maltreatment reports or referrals are received by a Statewide Hotline or through the county DHS offices. Referrals received after hours are screened to assess the need for immediate response. Referrals received during business hours are submitted to a supervisor for prioritization and worker assignment. The supervisor classifies each report into three priority areas, each with specific requirements regarding the time frame for initiating a response. Priority I investigations and assessments must be initiated within 24 hours of receipt; Priority II investigations must be initiated within the timeframe assigned by the supervisor which can range from 48 hours to two weeks depending on the risk suggested in the referral; and Priority III investigations and assessments must be initiated within 30 calendar days of acceptance. The results of the assessment were the following:

- Item 1 was rated as a Strength in 14 (70%) of the 20 applicable cases (10 of which were foster care cases).
- Item 1 was rated as an Area Needing Improvement in 6 (30%) of the 20 applicable cases (1 of which was a foster care case).

This item was rated as a Strength in all cases in which the initiation of a response to child maltreatment reports occurring during the period under review was in accordance with agency guidelines or policy for the priority level assigned to the report. For the 6 cases

rated as Area Needing Improvement, reviewers noted that the agency did not respond to one or more reports of child maltreatment in accordance with the timeframes established by policy. This included one report classified as Priority I, and five reports classified as Priority II.

Several stakeholders expressed the opinion that DHS responds to child maltreatment reports in a timely manner, and that the agency conducts effective and thorough investigations and assessments. Although other stakeholders suggested that the agency response time for initiating reports is frequently problematic, they noted that most delays in responding occur when reports are classified as Priority 2 or 3. Stakeholders representing the range of child welfare agency personnel levels from caseworkers to State administrators indicated that because of the high level of staff turnover and resulting high caseloads, reports classified as Priority II or III tend to be "put on hold" while workers respond to the more urgent cases first. Local level agency administrators noted that they make concerted efforts to improve response times by tracking them through the DHS management information system (KIDS) and monitoring them through management reports.

Determination and Discussion: Item 1 was assigned an overall rating of Area Needing Improvement based on the finding that in 30 percent of the applicable cases, the agency did not respond to a maltreatment report in a timely manner. Information from both the Statewide Assessment and stakeholder interviews suggests that the agency is highly effective in responding to Priority I reports in a timely manner, but that it experiences difficulties responding to lower priority reports in a timely manner because of the high level of staff turnover among the child welfare agency's front-line workers, which results in both inexperienced staff and excessive staff caseloads. This perception is supported by the case record review finding that only one of the six reports that were not initiated within the required time frame was a Priority I report. Case record review findings also support findings reported in the Statewide Assessment that the highest rates of non-compliance with respect to timeliness of investigations occur in the State's metropolitan areas. In the case record review, five of the six cases rated as Area Needing Improvement for this item were in Oklahoma County. Both of these findings support the perception of worker turnover and caseload size as being the primary cause of delayed investigations.

Item 2. Repeat maltreatment

☐ Strength ☒ Area Needing Improvement

Review Findings: The assessment of item 2 included all 50 case records. In assessing this item, reviewers were to determine whether there had been at least one substantiated or indicated maltreatment report during the period under review, and if so, whether another

substantiated or indicated report occurred within 6 months of that report. In Oklahoma, there is a designated finding of “services recommended” and, for purposes of the CFSR, this designation was considered equivalent to an “indicated” child maltreatment report. (“Indicated” for the purposes of the CFSR means that an allegation of maltreatment was indicated, or that there was reason to suspect maltreatment, but it was unfounded under State law or State Policy.) The results of the assessment were the following:

- Item 2 was rated as a Strength in 45 (90%) of the 50 applicable cases (22 of which were foster care cases).
- Item 2 was rated as an Area Needing Improvement in 5 (10%) of the 50 applicable cases (3 of which were foster care cases).

Item 2 was rated as a Strength in 90 percent of the 50 cases because children did not experience repeat maltreatment. However, most of these cases were either foster care cases in which the child entered foster care prior to the period under review, or in-home cases that were opened as a result of child maltreatment prior to the period under review and did not have a substantiated or indicated report during the period under review. Among the 18 cases in which there was at least one substantiated or indicated maltreatment report during the period under review, 5 (28%) had at least one other substantiated or indicated report within a 6 month period. This finding is consistent with the data reported in Oklahoma’s State Data Profile indicating that of all children with a substantiated or indicated child maltreatment report in the first 6 months of 2000, 11.7 percent had another substantiated or indicated maltreatment report within 6 months.

The results of the case record review also found that for two cases, a second maltreatment report occurred within 6 months of a prior substantiated or indicated report, but the report was "screened out" because the cases were open cases. Reviewers noted that the information obtained from the report was "passed on" to the caseworker handling the case rather than conducting an investigation or assessment. Reviewers also noted that they were told that this practice was “consistent with agency policy.” However, information from interviews with agency administrators indicated that DHS policy does not specify that maltreatment reports on open cases are to be "screened out" of the investigation or assessment process.

An additional finding with respect to repeat maltreatment was that there were multiple reports over the life of the case for the majority of the 50 cases reviewed. Although not all reports were substantiated or indicated, there were thirteen cases (26%) that had more than 10 maltreatment reports over the life of the case, and 5 (10%) with more than 20 reports. Only six cases (12 percent) had less than three maltreatment reports.

External stakeholders in the two less urban sites expressed the opinion that repeat maltreatment is not a problem in their communities. However, stakeholders in the urban site reported observing repeat maltreatment on a fairly frequent basis. This difference among stakeholders was not supported by case review information, which indicated that of the 5 cases involving repeat maltreatment, only 2 were in the urban site.

Most stakeholders attributed the recurrence of maltreatment to two key systemic factors. One factor is that in Oklahoma, a case that is "opened for services" does not usually have court involvement, and therefore family participation is voluntary. Stakeholders commenting on this issue included law enforcement personnel and mental health personnel as well as agency staff. They suggested that when parents do not participate in recommended services, maltreatment recurs. Although, technically, court involvement is possible for cases in which children remain in the home while the families receive services, stakeholders noted that this almost never happens because the District Attorneys are reluctant to take a case to court unless a removal is necessary.

In addition, many stakeholders – agency staff as well as external stakeholders – expressed the opinion that because only the District Attorney (DA) or a Guardian Ad Litem (GAL) can file a petition to remove a child from the home, often children who DHS believes need to be removed from their homes are not being removed because there may not be a strong enough case to support removal. Again, stakeholders suggested that this leads to incidents of repeat maltreatment.

Determination and Discussion: Item 2 was assigned an overall rating of Area Needing Improvement based on the following findings:

- In 10 percent of all cases reviewed, children experienced at least two substantiated or indicated maltreatment reports within a 6-month period;
- In 28 percent of the 18 cases in which children experienced at least one maltreatment report, they experienced another substantiated or indicated maltreatment report within a 6-month period.
- According to the State Data Profile, in 2000, the incidence of repeat maltreatment within a 6-month period was 11.7 percent, which does not meet the national standard of 6.1 percent.

As noted in the Statewide Assessment, DHS believes that repeat maltreatment primarily occurs in cases involving neglect. This perception is supported by data from the case record reviews indicating that the primary reason for child welfare agency contact for all five cases in which repeat maltreatment occurred was "Neglect (not including medical neglect)." The Statewide Assessment also noted that DHS is reviewing cases in which maltreatment recurs in order to identify potential contributing factors, and is in the process of implementing significant reforms to increase the use and effectiveness of prevention services.

Safety Outcome 2

Safety Outcome S2: Children are safely maintained in their homes whenever possible and appropriate.					
Number of cases reviewed by the team according to degree of outcome achievement:					
	Cherokee	Oklahoma	Pottawattomie	Total Number	Total Percentage
Substantially Achieved:	12	17	11	40	81.7
Partially Achieved:	0	3	0	3	6.1
Not Achieved or Addressed:	0	5	1	6	12.2
Not Applicable:	0	1	0	1	

STATUS OF SAFETY OUTCOME 2

Oklahoma did not achieve substantial conformity with Safety Outcome 2. This determination was based on the finding that this outcome was substantially achieved in only 81.7 percent of the case records reviewed, which is less than the 90 percent required for a rating of substantial conformity.

In general, case record reviews and stakeholder interviews indicated that DHS makes diligent efforts to maintain children safely in their homes by providing services to families to prevent placement or support reunification. However, in a number of cases reviewed, these services were determined to be of questionable effectiveness for ensuring the child's safety and reducing the risk of harm. Reviewers and stakeholders also observed that there are inconsistencies within the agency with respect to workers' efforts to monitor families to assess their participation in services and the impact of services on the family. Of particular concern was the fact that in several of the cases reviewed, a maltreatment report occurred while preventive services were being provided. Information from stakeholders and from the Statewide Assessment indicated that DHS is aware of this problem and has undertaken several initiatives to resolve the problem. For example, the agency contracted for an independent evaluation of its preventive services. When this evaluation revealed extensive variation in the types and quality of preventive services and questioned the effectiveness of key practices, the agency began an extensive and comprehensive process of redesigning its preventive services models and developing approaches derived from research findings. A clear strength for DHS with regard to ensuring children's safety is the agency's

willingness to devote resources to evaluating the effectiveness of various services and programs with respect to attaining desired outcomes.

Findings pertaining to the specific items assessed under Safety Outcome 2 are presented and discussed below.

Item 3. Services to family to protect child(ren) in home and prevent removal

☒ Strength ☐ Area Needing Improvement

Review Findings: There were 34 cases for which an assessment of item 3 was applicable. Sixteen cases were not applicable for this assessment because there were no substantiated or indicated maltreatment reports or identified risks of harm to the child in the home during the period under review. For this item, reviewers were to assess whether, in responding to a substantiated or indicated maltreatment report or risk of harm, the agency made diligent efforts to provide services to families to prevent removal of children from their homes while at the same time ensuring their safety. The results of this assessment were the following:

- Item 3 was rated as a Strength in 30 (88%) of the 34 applicable cases (7 of which were foster care cases).
- Item 3 was rated as an Area Needing Improvement in 4 (12%) of the 34 applicable cases (2 of which were foster care cases).

Cases were rated as a Strength when reviewers determined that DHS assessed the family's service needs appropriately and provided or referred the family for services to meet those needs. Often families were referred to the Comprehensive Home-Based Services program and a case manager from that program assumed responsibility for referrals and ongoing assessments. The most common referrals were for parenting classes, anger management classes, and counseling. Other services made available to parents to prevent removal and maintain children safely at home included day care and after school care, substance abuse treatment services, employment services, housing services, services to improve the home environment, and financial and educational services for parents. Child welfare agency workers also provided transportation services to assist families in keeping appointments.

Two cases were rated as a Strength for this item because reviewers noted that the children were immediately and appropriately removed from their homes to ensure their safety.

Cases were rated as an Area Needing Improvement when reviewers determined the following: (1) the agency worker did not follow up with the family to ensure that they were accessing or participating in services (1 case); or (2) the services provided were not sufficient or appropriate for the issues that the family was encountering (3 cases). In two cases, reviewers suggested that the failure to provide

appropriate services may have been the reason for a later maltreatment report that resulted in the removal of the children from the home.

Many stakeholders commenting on this issue expressed the opinion that in most areas of the State there is a strong network of community partners providing a broad array of services to meet identified needs. Both external (to DHS) and internal stakeholders noted that the CHBS has had a positive impact on the availability of services, although some stakeholders questioned whether the services are effective in preventing placement. In one county, stakeholders expressed positive opinions of the community mental health center, and clients interviewed by reviewers complimented their caseworkers for their efforts to connect them with services. Stakeholders also indicated that while they believe that DHS makes efforts to prevent removals, the focus of attention of the agency with respect to services is on the court-involved cases rather than on the in-home cases.

Determination and Discussion: This item was assigned an overall rating of Strength because in 88 percent of the cases, reviewers found that the agency had made diligent efforts to provide services to ensure children's safety while preventing their placement in foster care. Although stakeholders praised the CHBS program as an important resource for preventive services, they also noted that because parent participation in services is voluntary rather than court-ordered, the extent of the ability of CHBS to work with families depends on the family's willingness to accept services. Both external and DHS stakeholders suggested that training for child welfare agency staff in engaging families in voluntary services is necessary to ensure children's safety.

Item 4. Risk of harm to child

____ Strength X Area Needing Improvement

Review Findings: An assessment of item 4 was applicable for all 50 case records reviewed. The assessment of item 4 required reviewers to determine whether the agency had made, or was making, diligent efforts to reduce the risk of harm to the children involved in each case. The assessment resulted in the following findings:

- Item 4 was rated as a Strength in 41 (82%) of the 50 applicable cases.
- Item 4 was rated as an Area Needing Improvement in 9 (18%) of the 50 applicable cases.

This item was rated as a Strength when reviewers identified the following:

- The risk of harm to children was managed by removing the children from home and providing services to parents (13 cases).
- The risk of harm to children was appropriately addressed by removing the children from the home and seeking TPR both prior to and during the period under review (8 cases).

- The risk of harm to children was managed by providing services to families to address risk concerns while the children remain in the home or in a voluntary placement with relatives (20 cases).
- The risk of harm to children was addressed by removing the perpetrator (1 case).

The item was rated as an Area Needing Improvement when reviewers determined the following:

- The risk to children was not adequately addressed prior to reunification resulting in children being returned to potentially unsafe situations (3 cases);
- The services being provided were not adequate to effectively reduce risk while children remained in the home, leaving children at the same level of risk as when the case first came to the attention of the agency (4 cases); or
- No efforts were made to reduce risk (2 cases).

Stakeholders were divided in their opinions regarding the effectiveness of DHS in addressing the issue of ongoing risk of harm to children. Some stakeholders expressed the opinion that DHS does a good job in managing risk of harm to children and its efforts to reduce the risk of harm for children are largely successful. Other stakeholders, however, suggested that there is a need for improvement in this area. For example, some stakeholders expressed concern that children who need to be removed from their homes to reduce risk are not being removed because the District Attorneys do not want to take the case to court. Other stakeholders noted that many of the services needed to ensure children's safety while they are in their homes, such as services for domestic violence perpetrators and for methamphetamine addiction, are not available in the community to the extent necessary. One stakeholder within the agency suggested that part of the problem in addressing risk of harm to children is that workers, as well as the general public, do not view neglect as posing as much of a risk to children as physical abuse. However, as this stakeholder noted, most of the child fatalities are associated with neglect and it is necessary to keep staff informed and alert to the potential high level of risk that is posed by neglect.

Determination and Discussion: This item was assigned an overall rating of Area Needing Improvement because in 17 percent of the applicable cases, reviewers determined that DHS was not consistently effective in its efforts to reduce risk of harm to children. The findings indicate that although the agency is extremely effective in managing risk by removing children from their homes, it is less consistently effective in managing risk when children remain at home. This determination is consistent with the findings of an agency-funded evaluation of the OCS CHBS preventive services, as reported in the Statewide Assessment and discussed during stakeholder interviews. This evaluation found that while the availability of pre-placement and prevention services was considered to be an asset to the agency, there was extensive variation in the types and quality of services. Based on this evaluation, preventive services programs throughout the State are being redesigned and reassessed to increase their effectiveness in reducing risk to children. This process has incorporated an extensive review of relevant research and a focus on developing models that are evidence-based.

II. PERMANENCY

Permanency Outcome 1

Outcome P1: Children have permanency and stability in their living situations.					
Number of cases reviewed by the team according to degree of outcome achievement:					
	Cherokee	Oklahoma	Pottawatomie	Total Number	Total Percentage
Substantially Achieved:	5	7	4	16	64
Partially Achieved:	1	5	2	8	32
Not Achieved or Addressed:	0	1	0	1	4
Not Applicable:	6	13	6	25	
Conformity of Statewide data indicators with national standards:					
	National Standard (percentage)	State's Data (percentage)	Meets Standard	Does Not Meet Standard	
Foster care re-entries	8.6	15.3		X	
Length of time to achieve reunification	76.2	80.2	X		
Length of time to achieve adoption	32	31.3		X	
Stability of foster care placements	86.7	75.9		X	
Length of stay in foster care*	N/A	11.9 months			

*Not used to determine substantial conformity.

STATUS OF PERMANENCY OUTCOME P1

Oklahoma did not achieve substantial conformity with Permanency Outcome 1. This determination was based on the following:

- 64 percent of the case records were rated as having substantially achieved Permanency Outcome 1, which is less than the 90 percent required for an overall rating of substantial conformity;

- The State did not meet the national standards for the percentage of entries into foster care in Fiscal Year (FY) 2000 that were re-entries into care within 12 months of a prior foster care episode;
- The State did not meet the national standard for the percentage of children experiencing two or more placements during their first 12 months in foster care; and
- The State did not meet the national standard for the percentage of children who left the system to an adoptive placement in FY 2000 who were in foster care for 24 months or less, however the State percentage was very close (31.3%) to the national standard (32%).

One key finding of the CFSR with respect to Permanency Outcome 1, is that DHS is particularly effective in its efforts to reunify children with their families in a timely manner. The State exceeded the national standard for reunifications within 12 months and case record reviewers rated attainment of reunifications as a Strength in 85 percent of the applicable cases. The case record reviews indicated that for the most part children who are reunified with their families tend to achieve this outcome within 12 months from the time they entered foster care. Reviewers also observed that in most cases in which reunification was not achieved within 12 months, the agency had made diligent efforts to bring about a reunification as quickly as possible. Adoption efforts, however, do not appear to be as consistently effective as reunification efforts with respect to timeliness. Case record reviewers rated adoption as an Area Needing Improvement in 55 percent of the applicable cases primarily because of delays in filing for TPR or delays in changing goals of reunification to adoption when children have been in care for long periods of time.

The CFSR findings also indicate that many of the children in foster care in the State do not experience placement stability. Not only did the State not meet the national standard for this measure, but case record reviewers identified this as an Area Needing Improvement in 48 percent of the applicable cases. One of the key concerns identified regarding placement stability was the frequent use of emergency shelters as a first placement for all children without making efforts to explore alternatives.

Findings pertaining to the specific items assessed under Permanency Outcome 1 are presented below.

Item 5. Foster care re-entries

☐ Strength ☒ Area Needing Improvement

Review Findings: Six of the 50 case records were applicable to an assessment of foster care re-entries because they involved children who had entered foster care at some time during the period under review. In assessing this item, reviewers were to determine whether

the entry into foster care during the period under review had occurred within 12 months of discharge from a prior foster care episode. The results of this assessment were the following:

- Item 5 was rated as a Strength in 5 (83%) of the 6 applicable cases.
- Item 5 was rated as an Area Needing Improvement in 1 (17%) of the 6 applicable cases.

The one case that was rated as an Area Needing Improvement involved an entry into foster care that was within 5 months of discharge from a prior foster care episode.

Stakeholders expressed various perspectives regarding re-entries into foster care. While a few stakeholders commenting on this issue said that re-entries are rare, others indicated that they frequently see children going home for a while and then coming back into the system. A few stakeholders noted that DHS does not usually follow up with families or children post-reunification. Stakeholders reported that although the Aftercare Legislation was designed to protect children after reunification, it does not provide any additional dollars to support follow-up services. Consequently, there appears to be some confusion regarding the role of the DHS worker in a case that remains open because of the Aftercare Legislation.

Determination and Discussion: This item was assigned an overall rating of Area Needing Improvement for the following reasons:

- There was a re-entry into foster care in one of only six cases for which this assessment was applicable.
- The data reported in the State Data Profile indicate that the rate of re-entry into foster care within 12 months is 15.3 percent which does not meet the national standard of 8.6 percent.

According to information provided in the Statewide Assessment, the 15.3 percent re-entry rate may be an over-representation because the State's automated system (KIDS) currently "end dates" the child's removal episode when a child is reunified even though DHS continues to maintain care and placement responsibility for the child. As a result, some of the episodes reported are for children who have gone home on a trial visit, but have returned to foster care due to safety issues arising during the trial visit. The State plans to make changes to the KIDS system to ensure that the foster care placement is not considered as a "discharge" until the Department no longer has legal custody. As noted in the Statewide Assessment, a recalculation of the re-entry rate found that if policy defines a trial home visit as three months long, the re-entry rate would drop to 13 percent. A six-month trial home visit policy decreases the re-entry rate to 10.7 percent, and a nine-month trial home visit reduces the re-entry rate to 9.1 percent. It is not clear, however, from this discussion, how trial visits are differentiated from cases that are in Aftercare status and how this difference may impact re-entry rates.

Item 6. Stability of foster care placement

____ Strength __X__ Area Needing Improvement

Review Findings: All 25 foster care cases were applicable for an assessment of Item 6. In assessing this item, reviewers were to determine whether the child experienced multiple placement settings during the period under review and, if so, whether the changes in placement settings were necessary to achieve the child's permanency goal or meet the child's service needs. The findings of this assessment were the following:

- Item 6 was rated as a Strength in 15 (60%) of the 25 applicable cases.
- Item 6 was rated as an Area Needing Improvement in 10 (40%) of the 25 applicable cases.

Additional findings of the case record review were the following:

- Children in 11 cases experienced only one placement during the period under review, but in 3 of these cases the children experienced 5 or more placements prior to the period under review.
- Children in 10 cases experienced between 3 or 4 placements during the period under review.
- Children in 5 cases experienced 5 or more placements during the period under review.
- Children in 2 of the counties included in the onsite review frequently were placed in emergency shelters, usually at the time of removal from the home or when a disruption occurred in a substitute care placement.

Cases were assigned a rating of Strength for this item if reviewers determined that a child (1) did not experience more than two placement settings or, (2) experienced more than two placement settings, but the changes in setting were in the child's best interest. (such as movement from a shelter to a foster home, or from a residential treatment center to a therapeutic foster home).

A rating of Area Needing Improvement was assigned to a case when reviewers made the following determinations:

- Children experienced multiple placements and most placement changes were not intended to promote goal attainment or meet service needs.
- The agency was placing children in emergency shelters without attempting to find more appropriate alternative placements, such as relatives or a foster home.
- There was no indication that agency workers made efforts to address the needs of foster parents who were experiencing problems with a child in their care in order to prevent placement disruptions.

There was general agreement among stakeholders commenting on this issue that children in the system are moved too frequently from one placement to another and that placement resources are insufficient with respect to both quality and quantity. Some stakeholders expressed the opinion that there is too much pressure on agency workers to move children out of a shelter placement into a home.

Because of this pressure, placements often are made without careful matching, and when the homes do not meet the child's needs the placement disrupts. Other stakeholders noted that foster parents who call the agency and demand that children be moved immediately do not have the necessary skills to parent children with behavioral and emotional problems. All stakeholders were in agreement that more foster family homes are needed, particularly therapeutic foster homes. In addition, almost all stakeholders commenting on this issue agreed that kinship placements are highly successful for children and tend to be more stable placements than non-kin foster homes.

Stakeholders were more divided in their opinions on the issue of agency support for foster parents. Several stakeholders indicated that there is considerable agency support for foster parents and that the agency is effective in meeting foster parents' needs for services and information. Other stakeholders expressed concerns about the amount of support foster parents receive from the agency, and suggested that in some cases foster parents are not accorded sufficient respect and are not treated as part of a team effort to help the child. Stakeholders expressing this opinion generally indicated that excessive caseloads make it difficult for workers to be sufficiently responsive to foster parents' needs and concerns.

Some stakeholders suggested that placement disruptions are a primary reason for the high level of turnover among permanency workers. The fact that these workers are continually bombarded with demands for new placements but have no resources to meet the demand causes frustration and feelings that they are unable to help the children.

Determination and Discussion: Item 6 was rated as an Area Needing Improvement based on the following findings:

- The State Data Profile indicates that 75.9 percent of all children in foster care for 12 months or less had no more than two placement settings. This does not meet the national standard of 86.7 percent.
- The item was rated as an Area Needing Improvement in 40 percent of the 25 foster care cases reviewed.

Information from stakeholders and from the Statewide Assessment suggest that the data presented in the State Data Profile may not accurately reflect the number of children experiencing two or fewer placements during the first 12 months in foster care due to the way the State counts placement changes. The Statewide Assessment also noted that Oklahoma engages in a practice of placing children under age 6 in emergency foster care within 24 hours of admission to a shelter in order to expedite the return to a family-like setting. The agency contends that if they continue this practice, which they believe is "best practice," they will not be able to meet the national standard, because these children will have already had two placement settings within the first 24 hours in care.

Item 7. Permanency goal for child

____ Strength __X__ Area Needing Improvement

Review Findings: All 25 foster care cases were applicable for an assessment of item 7. In assessing this item, reviewers were to determine whether the agency had established an appropriate permanency goal for the child in a timely manner. The results of this assessment were the following:

- Item 7 was rated as a Strength in 20 (80%) of the 25 applicable cases.
- Item 7 was rated as an Area Needing Improvement in 5 (20%) of the 25 applicable cases.

The case record review found that the children in the 25 foster care cases had the following permanency goals:

- 12 children had a goal of reunification with parents or relatives;
- 11 children had a goal of adoption;
- 1 child had a goal of emancipation; and
- 1 child had a goal of guardianship with stepmother (after the father's death).

Of the 11 children with a current goal of adoption, 4 had a prior goal of "long term foster care," and 1 had a prior goal of emancipation.

Cases were assigned a rating of Strength for this item if reviewers determined that the goal was appropriate and had been established in a timely manner. Cases were assigned a rating of Area Needing Improvement when reviewers determined (1) that the child's goal of adoption was appropriate but that the agency had not established that goal in a timely manner (4 cases) (2) or that the child's goal of reunification was not appropriate because the child had been in foster care for 44 months with no evidence that the parent was meeting case plan or treatment plan requirements (1 case).

Stakeholders expressed a variety of opinions pertaining to the effectiveness of the agency in selecting and attaining permanency goals. Several stakeholders reported that the agency does a good job of establishing goals in a timely manner and is responsive to changing goals when there is sufficient reason to do so. Other stakeholders suggested that establishing goals in a timely manner was problematic and identified the following problems:

- Worker turnover causes delays in making appropriate changes in goals because when a new worker is assigned to a case, the tendency is to want to start over "fresh" with the family. This is a particular problem with regard to changing a child's goal from reunification to adoption.
- The goal of reunification is maintained for too long a period of time without evidence that parents are working on their treatment plans or fully cooperating with the agency.
- Concurrent planning is not being consistently implemented across the State, although in one county included in the CFSR, stakeholders noted that the courts and attorneys have agreed to file petitions for TPR while parents are still working on reunification plans. An agency stakeholder suggested that there is no structure and set of procedures in place to assist or guide workers in the concurrent planning process and that if this were established, the use of concurrent planning might expand.

Stakeholders also identified delays that will require legislative action to address. These were the following:

- Oklahoma statute allows parents to have a jury trial at both the adjudication and at the TPR hearing, and many parents exercise this right. This causes significant delays because the dockets for jury trials are generally lengthy. At present, there is pending legislation to eliminate the right to a jury trial at the point of adjudication.
- Oklahoma local District Attorneys, as a practice of law, may make a decision that requires, if there is an ongoing criminal case, the adjudication hearing cannot be held until the criminal case is heard and the outcome decided.

Determination and Discussion: Item 7 was assigned an overall rating of Area Needing Improvement based on the finding that in 20 percent of the applicable cases, reviewers determined that the agency had not established an appropriate goal for the child in a timely manner. However, this problem occurred primarily with respect to children with a goal of adoption who had been in foster care for a long time before the goal was changed to adoption. In contrast, for most of the children who had a goal of reunification, the goal was deemed to be appropriate and to have been established in a timely manner. The key issue in the cases rated as an Area Needing Improvement seemed to be that TPR was not being sought in a timely manner.

The Statewide Assessment, which identified many of the barriers to permanency reported in the stakeholder interviews, also noted that the Indian Child Welfare Act has different requirements related to TPR and permanency, and that this sometimes delays permanency for Indian Children. However, most stakeholders commenting on this issue noted that in general the Tribes are not adamantly opposed to seeking TPR, and will support TPR petitions, particularly if they have been involved in the case from the start.

Item 8. Reunification, Guardianship, or Permanent Placement with Relatives

☒ Strength ☐ Area Needing Improvement

Review Findings: Item 8 was applicable for 13 cases. In assessing these cases, reviewers were to determine whether the agency had achieved the goals of reunification, guardianship, or permanent placement with relatives for the children in a timely manner (that is, within 12 months of the removal of the children from their homes) or, if the goal had not been achieved in a timely manner, whether the agency had made, or was in the process of making, diligent efforts to achieve the children's goals. The results of this assessment were the following:

- Item 8 was rated as a Strength for 11 (85%) of the 13 applicable cases.
- Item 8 was rated as an Area Needing Improvement for 2 (15%) of the 13 applicable cases.

The assessment of item 8 also found that the permanency goal was achieved for 9 cases, and in 6 of those cases, permanency was achieved within 12 months. For the 2 cases rated as an Area Needing Improvement, the children had been in care for more than 12 months and the reviewers determined that the agency was not making sufficient efforts to reunify the families.

Stakeholders commenting on this issue spoke primarily about the State's guardianship program that uses TANF funds for eligible relatives seeking guardianship under certain conditions. All stakeholders expressed approval of this program and suggested that it could be even more effective in promoting permanency if the State eased the eligibility restrictions so that more children and relative caretakers could benefit from the program.

Other stakeholders identified current Family Group Conferencing efforts as a means to better involve families and expedite permanency. Family Group Conferencing is currently being piloted in the urban site visited, although its use is limited because of a lack of funding. Family Group Conferencing also is being used in a pilot program (Safe Havens) for families in which parents have substance abuse problems. All stakeholders involved or participating in the Family Group Conferencing approach were extremely positive about this approach and voiced the opinion that its use should be expanded throughout the agency.

Determination and Discussion: This item was assigned an overall rating of Strength for the following reasons:

- The State Data Profile indicates that the State's percentage for reunifications occurring within 12 months of entry into foster care (80.2%) meets the national standard of 76.2 percent.
- In 85 percent of the case records reviewed, reviewers determined that the agency had made, or was making, diligent efforts to attain permanency for children with permanency goals of reunification, permanent placement with relatives, or guardianship.

Current efforts to implement Family Group Conferencing, as noted by stakeholders and described in the Statewide Assessment, may result in further increasing the ability of DHS to expedite reunifications, permanent placements with relatives, or guardianships.

Item 9. Adoption

____ Strength __X__ Area Needing Improvement

Review Findings: Eleven of the foster care cases were assessed for item 9. In assessing this item, reviewers were to determine whether appropriate and timely efforts had been, or were being, undertaken to achieve finalized adoptions. The results were the following:

- Item 9 was rated as a Strength in 5 (45%) of the 11 applicable cases.
- Item 9 was rated as an Area Needing Improvement in 6 (55%) of the 11 applicable cases.

The case record review also found that adoptions had been finalized in 5 of the 11 applicable cases, and in 3 of those cases, adoptions were finalized within 24 months from the time the children were removed from their homes. At the time of the review, 8 of the children in the 11 "adoption" cases were in an adoptive placement (or adoptive home) with either relatives (5 cases) or foster parents (3 cases).

Cases were assigned a rating of Strength for this item if the adoptive placement had been finalized within 24 months or if the adoption had not been finalized, but reviewers determined that diligent efforts were being made to achieve a finalized adoption. Cases were rated as Area Needing Improvement when reviewers determined that there were, or had been, unnecessary delays in attaining a finalized adoption. The following are examples of cases assigned a rating of Area Needing Improvement:

- A case in which there were 35 months between removal and finalization of the adoption, and the mother was given 22 months before goal was changed to adoption, even though she had irregular contact with the department during that time and did not visit the child regularly.
- A case in which the changing of the child's permanency goal to adoption was delayed for a year without any valid reason, and after the goal was changed, no steps were taken to achieve an adoption.
- A case in which there were excessive delays due to the father's paternal rights not being addressed until after the mother relinquished, and to a lack of understanding on the part of the relative caregivers about the adoption process.
- A case in which the foster parent expressed interest in adopting the child, but there was delay in notifying the foster parents that the child was free for adoption.

Most of the barriers to timely adoptions identified by stakeholders were noted under item 7 and relate to barriers to establishing the goal of adoption and achieving TPR. The most frequently mentioned barrier to timely adoptions was that parents have a right to a jury trial in both adjudication hearings and TPR hearings. Some stakeholders, however, also noted that adoptions often are delayed when workers do not identify and locate fathers early on in a case so that the father's whereabouts and intentions with respect to the child are known prior to filing for TPR. Although this does not happen in all cases, there is inconsistency in the efforts made by DHS workers to contact and involve fathers early in the case process.

Several stakeholders reported that DHS has developed special initiatives aimed at expediting the adoption process. These are called the Swift Adoption program and the Transitions Unit pilot program. Both of these efforts received high praise from stakeholders and were described as highly successful initiatives with respect to expediting the adoptive process for children and adoptive parents.

Determination and Discussion: This item was assigned an overall rating of Area Needing Improvement based on the following:

- In 55 percent of the applicable cases, reviewers determined that DHS had not made diligent efforts to achieve adoptions in a timely manner.
- The State Data Profile demonstrates that the percentage of finalized adoptions in FY 2000 that occurred within 24 months of removal from home (31.3%) did not meet the national standard of 32 percent, although it was very close. According to the Statewide Assessment, however, the 31.3 percent statistic may be incorrect. DHS noted that it has been reporting a discharge date to AFCARS that reflects the point at which the child is placed in a trial adoption, rather than the point of adoption finalization, as the data indicator requires. When DHS realized this error, the agency conducted an informal analysis of current data, which resulted in a finding that only 22 percent of all finalized adoptions were finalized within 24 months of the time of removal.

Information in the Statewide Assessment was consistent with findings from the case record review that the key problem with respect to adoption delays was the time span prior to filing for TPR. However, as noted in the Statewide Assessment, communication gaps between adoption and permanency planning staff and a lack of understanding of the adoption process by many staff also were found to contribute to delays in moving the permanency process forward. The Swift Adoptions Program and the Transitions Unit are intended to resolve these problems.

Item 10. Permanency goal of other planned permanent living arrangement

☒ Strength ☐ Area Needing Improvement

Review Findings: Although this item was technically applicable to only one of the cases for which emancipation was the goal, there was another case in which long term foster care had been the goal until it was changed to adoption by the court in February 2002. Because this change was against the wishes of the child, who does not want to be adopted, the worker has continued efforts to ensure that the child is prepared for emancipation to independent living. Consequently, this item was assessed on two cases with the finding that the item was rated as a Strength in both cases (100%). In one case the rating of Strength was assigned because DHS had conducted a diligent search for an adoptive family until the foster parents and the child agreed to stop the search and focus on accessing the knowledge and skills necessary for independent living. The other case was rated as a Strength because even though the new goal is adoption, the agency is proceeding with the plan to provide the child, who is 15, with independent living services.

Several stakeholders noted that DHS rarely establishes a goal of long term foster care for children and that the agency operates a high quality program of independent living services for those children who are likely to be emancipated from foster care without achieving a permanent placement. However, there was a perception by some stakeholders that most of the high quality independent living programs have a limited number of slots and consequently serve only a small percentage of the children who need the services.

Determination and Discussion: This item was assigned an overall rating of Strength because in both applicable cases, reviewers determined that the goal was appropriate for the child and that DHS workers were in the process of helping the child attain that goal. The small number of cases for which long term foster care was the goal is consistent with DHS policy that reunification and adoption are the primary permanency goals.

Permanency Outcome 2

Outcome P2: The continuity of family relationships and connections is preserved for children.					
Number of cases reviewed by the team according to degree of outcome achievement:					
	Cherokee	Oklahoma	Pottawatomie	Total	Percentage
Substantially Achieved:	5	11	5	21	84
Partially Achieved:	1	2	1	4	16
Not Achieved or Addressed:	0	0	0	0	0
Not Applicable:	6	13	6	25	

STATUS OF PERMANENCY OUTCOME 2

Oklahoma did not achieve substantial conformity with Permanency Outcome 2. This determination was based on the finding that the outcome was rated as substantially achieved in only 84 percent of the cases, which is less than the 90 percent required for substantial conformity.

Although the State did not reach the required 90 percent achievement required for substantial conformity, there were many areas of strength with respect DHS's efforts to preserve the continuity of family relationships and connections for children in foster care. For example, in all but one of the applicable cases, children were placed in close proximity to parents or close relatives and in many cases, reviewers determined that DHS had made diligent efforts to promote and maintain the bond between parents and children by facilitating visitation and services that promote bonding. In addition, in all but a few of the applicable cases, children were placed with siblings when appropriate, and connections were preserved with family, community, friends, faith, and heritage. The key area of concern with respect to this outcome was the issue of relative placements. Although State policy is that relative placements are to be sought before other placement options are considered, reviewers determined that this was not the case in 28 percent of the applicable cases.

The findings pertaining to the specific items assessed under Permanency Outcome 2 are presented and discussed below.

Item 11. Proximity of foster care placement

☒ Strength ☐ Area Needing Improvement

Review Findings: Of the 25 foster care cases, 16 were applicable for an assessment of item 11. Cases that were not applicable for assessment were those in which TPR had been attained prior to the period under review or in which contact with parents was not considered to be in the child's best interest. In assessing item 11, reviewers were to determine whether the child's foster care setting was in close proximity to the child's parents or close relatives. This assessment resulted in the following findings:

- Item 11 was rated a Strength in 15 (94%) of the 16 applicable cases.
- Item 11 was rated an Area Needing Improvement in 1 (6%) of the 16 applicable cases.

In the 15 cases rated as a Strength, the children were placed in the same community or county as parents or relatives. In the case rated as an Area Needing Improvement for this item, the child was not placed in the same community or county as his parents and reasons for the separation were not documented.

The case review findings are not consistent with the perceptions of most of the stakeholders commenting on this issue. These stakeholders expressed the opinion that because DHS has insufficient placement resources, children are frequently placed far away from their families.

Determination and Discussion: Item 11 was assigned an overall rating of Strength because in all applicable cases, children were placed in close proximity to parents or close relatives. This finding is consistent with DHS policy requiring that every effort be made to achieve placement with a foster family in a child's own community when other preferred resources are not available.

Item 12. Placement with siblings

☒ Strength ☐ Area Needing Improvement

Review Findings: Twenty of the 25 foster care cases involved a child with siblings who were also in foster care. In assessing item 12, reviewers were to determine whether siblings were, or had been, placed together and, if not, whether separation was necessary to meet the needs (service or safety needs) of one or more of the children. This assessment resulted in the following findings:

- Item 12 was rated as a Strength in 19 (95%) of the 20 applicable cases.
- Item 12 was rated as an Area Needing Improvement in 1 (5%) of the 20 applicable cases.

In 17 of the 20 applicable cases, the child was in the same placement setting as at least one other sibling, and in 10 of these cases, the child was in the same placement setting as all of his or her siblings. In the 4 cases in which the child was separated from all of his siblings, reviewers determined that the separation was justifiable. In the 10 cases in which children were separated from at least one of their siblings, reviewers determined that the separation was justified in all but one case. For the most part, a justified separation was a planned separation in which placement together did not meet the emotional, behavioral, or medical needs of one or more of the siblings.

Stakeholders had mixed perceptions of the effectiveness of the agency in placing siblings together. Some stakeholders noted that siblings are frequently placed together unless it is an unusually large sibling group. Other stakeholders expressed the opinion that it is rare that siblings are placed together because there are not enough foster homes to accommodate sibling groups. Most stakeholders acknowledged that relative placements are helpful in keeping siblings together. A few stakeholders, while recognizing the importance of sibling connections, expressed concern about the wisdom of moving a child out of a stable home in which he or she is thriving to place them with siblings. These stakeholders suggested that there is a need for research information and professional clinical guidance around this issue.

Determination and Discussion: This item was assigned an overall rating of Strength based on the finding that in 95 percent of the cases, siblings were either placed together, or there was a justified reason for their separation. This is consistent with State policy, as noted in the Statewide Assessment, which requires that every reasonable effort be made to place siblings together unless there is documented evidence that such a placement would not be in the children's best interest.

Item 13. Visiting with parents and siblings in foster care

 X Strength Area Needing Improvement

Review Findings: An assessment of item 13 was applicable for 21 of the 25 foster care cases. Cases were not applicable if the child had no siblings in foster care, if the parents could not be located despite diligent efforts by the agency, or if visitation with the parents was not in the best interest of the child. In assessing this item, reviewers were to determine (1) whether the agency had made, or was making, diligent efforts to facilitate visitation between children in foster care and their parents and other siblings in foster care, and (2) whether these visits occurred with sufficient frequency to meet the needs of parents and children. The findings of this assessment were the following:

- Item 13 was rated as a Strength in 19 (90%) of the 21 applicable cases.
- Item 13 was rated as an Area Needing Improvement in 2 (10%) of the 21 applicable cases.

The analysis of case record reviews indicated that visits between children and their mothers took place on a weekly basis in four cases, twice a month in four cases, monthly in three cases, and less than monthly in two cases. For the two cases in which visits between the mother and child occurred on a less than monthly basis, reviewers determined that the agency had made concerted efforts to promote greater visitation between the mother and the child.

Fathers were far more likely than mothers to be identified as not applicable for this assessment because they could not be located or because visits between children and fathers were deemed to be not in the child's best interest. Visits between children and their fathers took place on a weekly basis in two cases, twice a month in four cases, monthly in one case, and less than monthly in one case. In the one case involving less than monthly visits, the father was incarcerated and it was difficult for the relatives to take the child to visit the father in prison every month, although visits did occur.

Visits between siblings occurred at least on a monthly basis for all applicable cases except one.

One of the two cases rated as Area Needing Improvement received this rating because reviewers determined that the agency made little or no efforts to ensure sibling contact when the children were placed separately. In the other case, the rating of Area Needing Improvement was assigned because, although visitation between the children and their mother normally took place on a weekly basis, there was a break in visits that lasted for over two months when it was determined that supervised visits were necessary. Instead of providing a venue for supervised visits, no visits took place.

The general perception of stakeholders commenting on this issue was that visitation between parents and their children and between siblings in foster care is taking place on at least a monthly basis and that DHS makes diligent efforts to facilitate visitation. However, reviewers noted that in interviews with the parents and children, they frequently expressed a wish to be able to visit on a more frequent basis. Agency stakeholders also noted that although once a month visits meet policy requirements, in many cases this level of visitation is not sufficient to maintain the parent-child bond and support reunification efforts. On the other hand, these stakeholders also noted that the caseload sizes of the agency workers do not permit facilitation of more frequent visitation.

Determination and Discussion: Item 13 was assigned an overall rating of Strength because in 90 percent of the applicable case records, reviewers determined that DHS had made, and was making, concerted efforts to facilitate visitation. In most cases, visitation occurred on at least a monthly basis with mothers, fathers, and siblings. According to the Statewide Assessment, because of the agency's concern that many families need more frequent visitation, innovative options for promoting increased family contact have been prioritized as a need in program improvement activities.

Item 14. Preserving connections

☐ Strength ☒ Area Needing Improvement

Review Findings: Item 14 was applicable for assessment in 24 of the 25 foster care cases. In assessing item 14, reviewers were to determine whether the agency had made, or was making, diligent efforts to preserve the child's connections to family, neighborhood, community, culture, family, faith, and friends while the child was in foster care. The assessment resulted in the following findings:

- Item 14 was rated as a Strength in 20 (83%) of the 24 applicable cases;
- Item 14 was rated as an Area Needing Improvement for 4 (17%) of the 24 applicable cases.

Case record reviewers indicated that in 19 of the 24 cases, children's primary connections had been "significantly" preserved while they were in foster care, and in 5 of the 24 cases, children's primary connections had been "partially" preserved. In addition, for the three foster care cases involving Indian children, reviewers determined that the Tribes had been notified at the onset of the case and

that the children were placed with extended family or another Tribal family. Cases were rated as an Area Needing Improvement for this item when reviewers determined that relationships with relatives had not been adequately preserved while the child was in foster care.

In general, stakeholders viewed DHS as not consistently effective with regard to preserving connections for children in foster care. Several stakeholders commenting on this issue suggested that connections are not always preserved for children because they move around so much in foster care that it is difficult to maintain them in the same schools. Stakeholders noted that often children are placed out of county, making it difficult for them to maintain connections with neighborhoods, friends, and relatives.

Stakeholders also expressed mixed opinions regarding the agency's effectiveness in preserving connections for Indian children. Some Tribal stakeholders in one county visited indicated that DHS works closely with them in preserving connections for Indian children and makes every attempt to place children in Indian foster homes. Stakeholders in other counties reported that there is some reluctance on the part of DHS workers to place children in Indian foster care homes because the Tribal standards for foster homes are less stringent than DHS standards and workers are concerned about the quality of care. However, most stakeholders agreed that at the State agency level, DHS engages in multiple and ongoing efforts to promote positive relationships with the many Tribes in Oklahoma.

Determination and Discussion: Item 14 was assigned an overall rating of Area Needing Improvement because in 17 percent of the cases, reviewers determined that children's connections to family, community, culture, faith, and friends had not been preserved while the child was in foster care. However, reviewers noted that for Native American children in foster care, the agency had been effective in preserving children's connections. In these cases, the Tribe had been involved in the case immediately and placements were made with either a relative or a tribal family.

Item 15. Relative placement

☐ Strength ☒ Area Needing Improvement

Review Findings: All 25 foster care cases were applicable for an assessment of item 15. In assessing this item, reviewers were to determine whether the agency had made diligent efforts to locate and assess relatives (both maternal and paternal relatives) as potential placement resources for children entering foster care. The results of this assessment were the following:

- Item 15 was rated as a Strength in 18 (72%) of the 25 applicable cases.
- Item 15 was rated as an Area Needing Improvement in 7 (28%) of the 25 applicable cases.

Cases were rated as a Strength when reviewers determined that children were already placed with relatives (11 cases) or that children were not placed with relatives but the agency had made diligent efforts to seek relatives and assess them as a placement resource (7 cases). Of the 11 children placed with relatives, 2 were placed with their maternal grandparent, 4 with their maternal aunt/uncle, 2 with their paternal aunt/uncle, and 1 with an older sister. In two placements, reviewers did not provide information about the relative's relationship to the child.

Cases were rated as an Area Needing Improvement when reviewers determined that the agency had made no efforts to explore the possibility of relative placements (3 cases), or when the agency had conducted only a limited exploration of potential relative placements, such as exploring maternal relatives but not paternal relatives (3 cases).

The majority of stakeholders commenting on this issue expressed the opinion that DHS makes concerted efforts to place children with relatives whenever possible and that this is a major strength for the agency. A few stakeholders also noted that the agency was a driving force behind a new law to allow expedited criminal background checks on relatives by law enforcement when children are removed after hours so that children do not have to go to shelters.

Determination and Discussion: Despite the positive views expressed by stakeholders concerning DHS' effectiveness in placing children with relatives, this item was assigned an overall rating of Area Needing Improvement because reviewers determined that in 28 percent of the cases, the agency had not made diligent efforts to locate and assess relatives as potential placement resources. A primary problem identified was that workers were not fully exploring paternal relatives as options for placement, although they frequently sought maternal relatives for this purpose. This suggests that although DHS has a clear policy requiring a focus on kinship placement as an important and primary placement resource, the policy is not being consistently implemented in practice, particularly with respect to paternal relatives.

Item 16. Relationship of child in care with parents

☒ Strength ☐ Area Needing Improvement

Review Findings: An assessment of item 16 was applicable for 18 of the 25 foster care cases. A case was considered not applicable for an assessment of this item if a relationship with the parents was considered to be not in the child's best interests. In assessing this item, reviewers were to determine whether the agency had made diligent efforts to support or maintain the bond between the child and both of his/her parents through visitation and provision of services that promote bonding. Based on these criteria, item 16 was rated as

a Strength in all 18 (100%) applicable cases. Reviewers identified many examples of a close relationship between parents and the children in care, including parents involvement in school activities and in taking children for their medical or dental appointments.

Determination and Discussion: Item 16 was assigned an overall rating of Strength because reviewers determined that in all cases, the agency was supporting the parent-child relationships of children in foster care. However, information from stakeholder interviews noted under item 13, suggests that many agency staff believe that visits between parents and children in foster care must occur more frequently than once a month to adequately support and maintain the bonds between parents and children. Consequently, the agency plans to focus on ways to enhance visitation in order to further maintain and strengthen bonds.

III. CHILD AND FAMILY WELL-BEING

Well Being Outcome 1

Outcome WB1: Families have enhanced capacity to provide for their children's needs.					
Number of cases reviewed by the team according to degree of outcome achievement:					
	Cherokee	Oklahoma	Pottawatomie	Total Number	Total Percentage
Substantially Achieved:	10	17	8	35	70
Partially Achieved:	2	5	4	11	22
Not Achieved or Addressed:	0	4	0	4	8
Not Applicable:	0	0	0	0	

STATUS OF WELL-BEING OUTCOME 1

Oklahoma did not achieve substantial conformity with Well-Being Outcome 1. This determination was based on the finding that the outcome was rated as substantially achieved for only 70 percent of the case records reviewed, which is less than the 90 percent required for a determination of substantial conformity.

A general finding of the CFSR process was that DHS is not consistent in its efforts to ensure that families have enhanced capacity to provide for their children's needs. Although in the majority of cases, DHS was successful in supporting the capacity of families to

provide for their children, in over 20 percent of the cases, reviewers determined that the needs and services of children, parents, and/or foster parents were not being met; the parents and children were not being appropriately involved in the case planning process; and/or the frequency of worker visits with children and parents was not sufficient to meet their needs. Many stakeholders expressed opinions that were consistent with the case findings. Stakeholders also noted that the Family Group Conferencing model that is being piloted in one of the counties is a highly effective approach to promoting a family's capacity to provide for their children's needs and its use should be expanded throughout the agency.

Findings pertaining to the specific items assessed under Well-Being Outcome 3 are presented and discussed below.

Item 17. Needs and services of child, parents, foster parents

☐ Strength ☒ Area Needing Improvement

Review Findings: An assessment of item 17 was applicable for all 50 cases. In assessing this item, reviewers were to determine whether the agency had (1) adequately assessed the needs of children, parents, and foster parents; and (2) provided appropriate services to meet those needs. The results were the following:

- Item 17 was rated as a Strength in 39 (78%) of the 50 applicable cases (19 of which were foster care cases).
- Item 17 was rated as an Area Needing Improvement in 11 (22%) of the 50 applicable cases (6 of which were foster care cases).

Reviewers made the following determinations from the case records and case-related interviews:

- Children's needs were assessed in 43 of the 50 cases and services were provided in 45 cases. There were 6 cases in which reviewers determined that the services received were not appropriate to the children's needs.
- Mothers' needs were assessed and services provided in 37 of the 40 cases in which an assessment of mothers' needs was applicable.
- Fathers' needs were assessed and services were provided in 15 of the 29 cases in which an assessment of fathers' needs was applicable.
- Foster parents' needs were assessed in 20 of the 25 foster care cases, but services were provided in 23 cases.

Cases were rated as a Strength for this item when there were no unmet assessment or service needs for children, mothers, or foster parents. However, in five cases assigned a rating of Strength, reviewers noted that there had been little or no assessment of fathers' needs or provision of services to fathers.

A rating of Area Needing Improvement was assigned to cases in which reviewers made the following determinations:

- Children or parents had identified services needs that were not met during the course of the case (6 cases).
- Children's or parent's needs were not assessed at all, or not assessed in sufficient depth (3 cases).
- Caseworkers did not follow up to determine whether parents were accessing services (1 case).
- Foster parents did not receive sufficient services and supports from the agency to ensure the well-being of the child (1 case).

Stakeholders commenting on this issue expressed mixed opinions regarding the effectiveness of DHS with regard to meeting the service needs of children and their families. Some stakeholders suggested that although there are services lacking in some communities (discussed further under Section VIII, Service Array), DHS generally does a good job accessing services for children and their families. Some internal stakeholders expressed the opinion that greater efforts are made to access services for children and parents in foster care cases than for children and parents in in-home services cases, although this was not supported by the information from the case review. Stakeholders also were divided with respect to their perceptions on the issue of support for foster parents. While some stakeholders indicated that foster parents receive a lot of support and services from workers, others suggested that support for foster parents is an area where improvements are needed.

Determination and Discussion: Item 17 was assigned an overall rating of Area Needing Improvement because in 22 percent of the cases, reviewers determined that the needs and services of children, parents, and/or foster parents had not been, or were not being, adequately addressed by DHS. It is important to note that this finding reflects an inconsistency in DHS practice rather than typical casework practice. In the majority of cases, the services needs of children, mothers, and foster parents were adequately assessed and met. The primary concern identified by reviewers, however, was that DHS is not being consistent in providing fathers with adequate attention with respect to their services needs.

Item 18. Child and family involvement in case planning

____ Strength __X__ Area Needing Improvement

Review Findings: An assessment of item 18 was applicable for 48 of the 50 cases. In assessing this item, reviewers were to determine whether parents and children (if age-appropriate) had been involved in the case planning process, and if not, whether their involvement was contrary to the child's best interest. A determination of involvement in case planning required that a parent had actively participated in identifying the services and goals included in the case plan. This assessment produced the following findings:

- Item 18 was rated as a Strength in 29 (60%) of the 48 applicable cases (13 of which were foster care cases).
- Item 18 was rated as an Area Needing Improvement in 19 (40%) of the 48 applicable cases (10 of which were foster care cases).

In assessing this item, reviewers made the following determinations:

- Mothers were appropriately involved in the case planning process in 28 cases. In 8 cases, the mother was not involved but should have been. There were 7 cases in which the mother was not available to participate, and 5 cases in which the mother's participation was considered to be contrary to the child's best interest.
- Fathers were appropriately involved in the case planning process in 16 cases. In 5 cases the father was not involved but should have been. There were 18 cases in which the father was not available to participate and 9 cases in which the father's participation was considered to be contrary to the child's best interest.
- Children were appropriately involved in the case planning process in 21 cases. In 10 cases, children were not involved although reviewers determined that they were old enough to have been involved. There were 17 cases in which reviewers determined that the children were not old enough to participate in the case planning process.

Cases were assigned a rating of Strength for this item when reviewers determined that all relevant parties had actively participated in the case planning process. Cases were assigned a rating of Area Needing Improvement when reviewers determined that one or more of the key parties had not been involved in the case planning process.

There was general agreement among stakeholders commenting on this issue that there is a lack of consistency among DHS workers with regard to involving families in developing case plans. The opinion most frequently expressed by stakeholders was that case plans are developed for families without their input and then presented to the families for signature. However, agency stakeholders noted that families are more consistently involved in the initial strengths and needs assessment process, which then drives the development of the case plan. In addition, reviewers noted that there was little evidence in case records of a clear case planning process and that expressed the opinion that the case planning process was confusing.

An agency stakeholder also noted that a family group conferencing model is being piloted to enhance permanency planning efforts. All stakeholders who were connected to or familiar with this pilot voiced the opinion that it is a highly effective process for involving families in case planning as well as keeping everyone focused on permanency. Agency stakeholders, including caseworkers, noted that workers volunteer to facilitate the family group conferences even though it is extra work for them because they believe strongly in the effectiveness of the process. Agency administrators noted that at this point, family group conferencing is available on only a limited basis because no funds are available to expand it.

Determination and Discussion: Item 18 was assigned an overall rating of Area Needing Improvement based on the finding that in 40 percent of the applicable case records, reviewers determined that DHS had not appropriately involved parents or children in the case planning process. This finding is contrary to DHS policy described in the Statewide Assessment. DHS requires that parents be involved in the assessment and treatment planning in order to identify strengths and needs, goals, and services and to evaluate progress as it relates to their plan. The findings of the case record review suggest that this policy is implemented inconsistently. In addition, the Federal CFSR case review findings identified fewer cases in which families are involved in planning than did the State's self-administered CFSR process. Data from the State CFSR indicated that mothers involvement in case planning was found in 88 percent of the cases reviewed, while fathers' involvement was found in 75 percent of the cases.

Item 19. Worker visits with child

____ Strength __X__ Area Needing Improvement

Review Findings: All 50 cases were applicable for an assessment of item 19. In conducting this assessment, reviewers were to determine whether the frequency of visits between the caseworker and the children were sufficiently frequent to ensure adequate monitoring of the child's safety and well being and whether visits focused on issues pertinent to case planning, service delivery, and goal attainment. The results of the assessment were the following:

- Item 19 was rated as a Strength in 41 (82%) of the 50 applicable cases (21 of which were foster care cases).
- Item 19 was rated as an Area Needing Improvement in 9 (18%) of the 50 applicable cases (4 of which were foster care cases).

Reviewers noted the following with respect to frequency of visits: In four cases, visits occurred once a week; in 9 cases visits typically occurred twice a month; in 31 cases, visits occurred on a monthly basis; and in 6 cases, visits occurred on less than monthly basis. In two cases, visitation increased as the child and family moved closer to reunification.

Cases were assigned a rating of Strength for this item when reviewers determined that the frequency and quality of visits between caseworkers and children was sufficient to ensure adequate monitoring of the child's safety and well being. Cases were rated as an Area Needing Improvement when reviewers determined that (1) worker visits with children were not sufficiently frequent to meet the needs of the child, or (2) visits were frequent but did not focus on issues pertinent to case planning, service delivery, and goal attainment.

Only a few stakeholders commented on this issue, with most of them expressing the opinion that workers are in contact with children at least once a month. However, these stakeholders also noted that problems with visitation often occur as a result of worker turnover,

because when a case is reassigned, the new worker may not have sufficient time to schedule a monthly visit because of the increased caseload demands.

Determination and Discussion: Item 19 was assigned an overall rating of Area Needing Improvement based on the finding that in 18 percent of the case records, reviewers determined that caseworker visits with children were not sufficiently frequent or did not sufficiently address the child's safety and well-being. Again this finding reflects inconsistencies in practice rather than typical casework practice. There were a number of cases in which workers were diligent about making at least monthly visits and sometimes visited more often. In addition, this finding is not consistent with the findings of the October 2001 Continuous Quality Improvement report, described in the Statewide Assessment. This report indicated that the statewide average for contact compliance was 94 percent. Furthermore, data from the State-administered CFSR process indicate compliance with the visitation policy in 86 percent of the cases. The Statewide Assessment noted, however, that although the State can measure frequency of visits, the KIDS does not measure the quality of each contact.

Item 20. Worker visits with parents

☐ Strength ☒ Area Needing Improvement

Review Findings: An assessment of item 20 was applicable for 41 of the 50 applicable cases. Cases that were considered not applicable for an assessment of this item were those in which parental rights had been terminated and the parents were no longer involved in planning for the child, or cases in which parents could not be located despite diligent efforts by the agency. In assessing this item, reviewers were to determine whether the caseworker had sufficient face-to-face contact with the mothers and fathers of the children to promote attainment of the child's permanency goal or to ensure the child's safety and well-being. The results of this assessment were the following:

- Item 20 was rated as a Strength in 32 (78%) of the 41 applicable cases (12 of which were foster care cases).
- Item 20 was rated as an Area Needing Improvement in 9 (22%) of the 41 applicable cases (4 of which were foster care cases).

In assessing item 20, case record reviewers made the following determinations: (1) in 5 cases, parents were visited weekly; (2) in 5 cases, parents were visited twice a month; (3) in 20 cases, parents were typically visited on a monthly basis; and (4) in 11 cases, parents were visited on a less than monthly basis. Cases were rated as a Strength when reviewers determined that visits occurred with sufficient frequency to meet the needs of parents and children and that visits focused on issues pertinent to case planning, service delivery, and goal attainment. Cases were rated as an Area Needing Improvement when reviewers determined that visits were not

sufficiently frequent to meet the needs of parents and children (7 cases) or did not focus on substantive issues pertaining to the case (2 cases).

Determination and Discussion. This item was assigned an overall rating of Area Needing Improvement because in 22 percent of the applicable case records, reviewers determined that visits with parents were not sufficiently frequent or of sufficient quality to promote the safety and well-being of the child or increase movement toward permanency for the child. Despite this rating, there were many cases in which workers visits parents on a frequent basis and made diligent efforts to assess the case status and needs of children and parents during the visits. In addition, reviewers determined that in most of the cases in which problems occurred, the lack of visitation could be attributed to excessive caseloads or a case that was not fully assigned to a new worker because of worker turnover.

Well Being Outcome 2

Outcome WB2: Children receive appropriate services to meet their educational needs.					
Number of cases reviewed by the team according to degree of outcome achievement:					
	Cherokee	Oklahoma	Pottawatomie	Total Number	Total Percentage
Substantially Achieved:	7	14	8	29	81
Partially Achieved:	1	3	0	4	11
Not Achieved or Addressed:	0	1	2	3	8
Not Applicable:	4	8	2	14	

STATUS OF WELL-BEING OUTCOME 2

Oklahoma did not achieve substantial conformity with Well-Being Outcome 2, based on the finding that only 81 percent of the case records reviewed were found to have substantially achieved this outcome. This is less than the 90 percent required for substantial conformity.

The general finding of the CFSR case record review process was that attention to children's educational needs and services was not consistent. Although in the majority of cases, DHS workers were diligent in their efforts to help children meet their educational needs, reviewers noted that in 19 percent of the cases, the children's educational needs were not being met.

The findings for the item assessed for Well Being Outcome 2 are presented below.

Item 21. Educational needs of the child

____ Strength __X__ Area Needing Improvement

Review Findings: An assessment of item 21 was applicable for 36 of the 50 case records reviewed. Cases that were not applicable for assessment were those in which the children were too young to be enrolled in school or preschool, or those in-home services cases in which the children did not have needs pertaining to education-related issues. In assessing this item, reviewers were to determine whether the child's educational needs were appropriately assessed and whether services were provided to meet those needs. The results of this assessment were the following:

- Item 21 was rated as a Strength in 29 (81%) of the 36 applicable cases (15 of which were foster care cases).
- Item 21 was rated as an Area Needing Improvement in 7 (19%) of the 36 applicable cases (6 of which were foster care cases).

Reviewers reported the following additional findings with respect to this item:

- Educational needs were assessed in 26 cases, were not assessed in 7 cases, and were not applicable for assessment in 17 cases.
- Services were provided to meet educational needs in 26 cases, services were not provided in 4 cases, and service provision was not applicable for assessment in 20 cases.
- Eight of the 16 foster care cases that should have had school records in the case file did not have school records in the case file.
- Nine of the 16 foster parents or relative caretakers that should have received school records at the time of placement did not receive school records.
- In 12 cases, the children experienced multiple school changes as a result of placement changes in foster care.

Foster care cases were rated as a Strength for this item if there was evidence that the agency had assessed the children's educational needs, had provided services to meet those needs (if necessary), had included school records in the case file, and had provided school information to foster parents at the time of placement. Cases were assigned a rating of Area Needing Improvement when children experienced multiple school changes (3 cases), school records were not provided to foster parents (2 cases), educational needs were identified but not addressed (2 cases), or educational assessments were not completed in a timely manner (2 cases). In the two cases in which it was noted that school records were not provided to foster parents, another reason for rating the case as an Area Needing Improvement also was given.

Stakeholders commenting on this issue voiced a range of opinions. A few stakeholders noted that foster parents play an active role in advocating for educational needs, but DHS workers do not take as active a role as they should. Other stakeholders noted that DHS workers attend IEP meetings and work with the schools to get the necessary services for the children. Stakeholders in one site indicated that the schools were very cooperative and that the agency has a social worker based in the schools. In contrast, stakeholders in other sites felt that the schools were not as cooperative as they needed to be to ensure that the educational needs of children in foster care were being met.

Determination and Discussion: Item 21 was assigned an overall rating of Area Needing Improvement because for 19 percent of the cases, reviewers determined that the educational needs of children were not effectively and appropriately addressed. This finding is not consistent with DHS policy designed to ensure that the education needs of children are identified in assessments and case planning and that those needs are addressed through services. The findings also are not fully consistent with the findings of the State-administered CFSR process, although there are some similarities. The findings of the State CFSR were that 99 percent of the children are participating in appropriate educational services, and that necessary adjustments were implemented for 91 percent of the children to ensure that specific educational needs were addressed. However, necessary documentation of services was found in only 60 percent of the cases, and caregivers were provided with records in only 76 percent of the cases. The State CFSR process also found that placement disruptions negatively affected the continuity of education services for 32 percent of the children in the cases reviewed.

Well-Being Outcome 3

Outcome WB3: Children receive adequate services to meet their physical and mental health needs.					
Number of cases reviewed by the team according to degree of outcome achievement:					
	Cherokee	Oklahoma	Pottawatomie	Total Number	Total Percentage
Substantially Achieved:	10	18	7	35	71
Partially Achieved:	1	4	3	8	16
Not Achieved or Addressed:	1	3	2	6	12
Not Applicable:	0	1	0	1	

STATUS OF WELL-BEING OUTCOME 3

Oklahoma did not achieve substantial conformity with Well-Being Outcome 3. This determination was based on the finding that the outcome was rated as substantially achieved in only 71 percent of the applicable cases, which is less than the 90 percent required for a determination of substantial conformity.

In general, the CFSR process found that DHS was not consistently effective in meeting either the physical or mental health needs of the children in foster care or in in-home services cases, although in the majority of cases, DHS did address these needs for children. The key problems identified with respect to physical health services were that (1) some children were not receiving comprehensive health assessments at entry into foster care and (2) some children were not receiving the services necessary to meet identified health needs. The problem identified with regard to mental health services was that children had mental health needs that were not being appropriately addressed.

Findings pertaining to the specific items assessed under Well-Being Outcome 3 are presented and discussed below.

Item 22. Physical health of the child

☐ Strength ☒ Area Needing Improvement

Review Findings: An assessment of item 22 was applicable for 47 of the 50 case records reviewed. Cases that were not applicable for this assessment were in-home services cases for which no physical health issues were identified. All cases involving children in foster care were applicable for an assessment of item 22. In assessing this item, reviewers were to determine whether (1) children's physical health needs had been appropriately assessed, and (2) services necessary to meet those needs had been, or were being, provided. The findings of this assessment were the following:

- Item 22 was rated as a Strength in 36 (77%) of the 47 applicable cases (18 of which were foster care cases).
- Item 22 was rated as an Area Needing Improvement in 11 (23%) of the 47 applicable case records (7 of which were foster care cases).

An additional finding was that of the 25 foster care cases, 10 children did not receive a health screening at entry into foster care. However, for most of these cases, the child entered foster care prior to the period under review.

In general, cases were rated as a Strength when the children's health needs were being routinely assessed and services provided as needed. Cases were rated as an Area Needing Improvement when reviewers determined one or more of the following:

- The child did not receive a comprehensive health assessment at entry into foster care (6 cases).

- The child had specific needs for health care services that were not being met (4 cases).
- There was no evidence that children were receiving preventive health care services (2 cases).
- Foster parents were not given complete health records at the time that the child was placed in their home (3 cases), although no case was rated as an Area Needing Improvement solely for this reason.

Stakeholders commenting on this issue generally focused on the difficulty of finding high quality medical and dental service providers who will accept Medicaid payments. Many stakeholders expressed concern that children who are in critical need of medical services get put on long waiting lists because of Medicaid. One foster parent had a foster child who was on a 3-month waiting list to have tubes installed in his ears because of frequent ear infections. In contrast, an agency stakeholder expressed the opinion that medical needs are being met, particularly for children in foster care, but it is not always being documented in the case records.

Determination and Discussion: Item 22 was assigned an overall rating of Area Needing Improvement based on the finding that in 23 percent of the applicable case records, reviewers determined that DHS was not adequately addressing the health needs of children in both foster care and in-home services cases. This determination reflects a lack of consistency among DHS workers in attending to children's health needs, with workers in the majority of cases being highly effective in addressing those needs.

According to the Statewide Assessment, DHS has identified some aspects of health-related practices as needing improvement, based on the findings of the State administered-CFSR process. This process found that although annual health screenings have occurred for 85 percent of the children in the cases reviewed, services have been provided to address the health and dental needs of 91 percent of the children, and immunizations remain current for 95 percent of children, only 68 percent of children reviewed received health screenings within 30 days of entry to custody, only 69 percent of the children received dental exams within the last 12 months, and only 70 percent of caregivers had received health records.

Item 23. Mental health of the child

☐ Strength ☒ Area Needing Improvement

Review Findings: An assessment of item 23 was applicable for 38 of the 50 case records reviewed. Cases that were not applicable were foster care cases in which the child was too young for an assessment of mental health needs, and in-home services cases in which the children's mental health needs were not an issue. In assessing this item, reviewers were to determine whether (1) mental health needs had been appropriately assessed and, (2) appropriate services to address those needs had been offered or provided. The findings of this assessment were the following:

- Item 23 was rated as a Strength in 28 (74%) of the 38 applicable cases (13 of which were foster care cases).
- Item 23 was rated as an Area Needing Improvement in 10 (26%) of the 38 applicable cases (9 of which were foster care cases).

For the 38 applicable cases, reviewers noted that children's mental health needs were "significantly assessed" in 27 cases, "partially assessed" in 8 cases, and "not at all assessed" in 3 cases. Reviewers also reported that mental health needs were "significantly met" for 28 cases, "partially met" for 5 cases, and "not at all" met for 2 cases (3 cases did not require mental health services based on the assessment).

Cases were assigned a rating of Strength if mental health needs were "significantly" assessed and the children's mental health needs were "significantly" met. The item was rated as an Area Needing Improvement when reviewers determined that assessments and services were provided only partially or not at all. Some examples of cases rated as Area Needing Improvement include the following:

- A case in which the child's foster/adoptive parents requested play therapy for the child because of the child's emotional and behavioral problems, but the social worker did not follow through with a referral. This child had never received a mental health assessment.
- A case in which a child never received a mental health assessment, although the foster mother expressed concern about the child's "depression and anxiety" resulting from the separation from her mother.
- A case in which the children received mental health assessments but the assessments did not address the severe behavioral problems being exhibited by one of the children.

Stakeholders commenting on this issue focused primarily on the lack of sufficient mental health services rather than on the capacity of the agency to meet children's mental health service needs. This is discussed further under item 35.

Determination and Discussion: Item 23 was assigned an overall rating of Area Needing Improvement because in 26 percent of the applicable cases, reviewers determined that children's mental health needs were not being adequately addressed by DHS. As noted in the Statewide Assessment, a DHS survey resulted in somewhat similar findings. In this survey, 55 percent of respondents felt that children's mental health needs were consistently met, 27 percent felt that they were "sometimes" met, and 18 percent did not feel that mental health needs were met at all.

SECTION 2: SYSTEMIC FACTORS

IV. STATEWIDE INFORMATION SYSTEM

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2	3	4X

STATUS OF STATEWIDE INFORMATION SYSTEM

Oklahoma is in substantial conformity with the factor of Statewide Information System. Findings with respect to the item assessed for this factor are presented below.

Item 24. State is operating a Statewide information system that, at a minimum, can readily identify the status, demographic characteristics, location, and goals for the placement of every child who is (or within the immediately preceding 12 months, has been) in foster care.

 X Strength Area Needing Improvement

This item has been rated as a Strength because Oklahoma's automated child welfare system (SACWIS) – KIDS – has been implemented Statewide and can identify the status, demographic characteristics, location, and goals for the placement of every child who is currently, or has recently been, in foster care. According to the Statewide Assessment, KIDS was implemented Statewide in 1995 and is one of only four State systems that has passed the SACWIS Statewide Assessment Review (SAR) requirements. KIDS also interfaces with Child Support, Eligibility, Financial Management and Juvenile Justice programs.

Within the child welfare agency, KIDS is considered the primary case record with supporting paper documents such as copies of birth certificates, social security cards and court documents being stored in paper files. In addition, the system is able to track and monitor contracts on line. Stakeholder interviews revealed that KIDS is viewed positively within the agency, with caseworkers giving it high marks for ease of use, and supervisors praising its usefulness as a management tool. The system is capable of producing numerous

management reports that help track outcomes as well as manage workloads. Information from stakeholders and from the Statewide Assessment indicate that the key problem with respect to the system is that data are not always entered in a manner that is timely and complete, despite tools created within KIDS to make it easy to identify missing information. From the worker's perspective, the use of the system is time consuming and takes away from time they need to be spending working on their cases. Workers cannot rely on clerical staff to enter information because the number of clerical staff has been greatly reduced since the implementation of KIDS and most clerical staff are not trained on how to use KIDS.

V. CASE REVIEW SYSTEM

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2X	3	4

STATUS OF CASE REVIEW SYSTEM

Oklahoma is not in substantial conformity with the systemic factor of Case Review System. Findings with regard to specific items assessed for this factor are presented below.

Item 25. Provides a process that ensures that each child has a written case plan to be developed jointly with the child's parent(s) that includes the required provisions.

____ Strength __X__ Area Needing Improvement

Item 25 has been assigned a rating of Area Needing Improvement because, although case plans are routinely developed for all children, DHS workers are inconsistent in their involvement of parents and children in the development process.

According to the Statewide Assessment, every child is to have a written case plan. DHS has established specific policies regarding the time frames for the completion of the different components of the case plan. The key elements of all case plans are (1) the Family/Child Strengths and Needs Assessment and (2) the Treatment Plan. These elements of the case plan are required to be

continually updated to track progress of family members and change in child's status. DHS policy requires that parents are to be involved in the development of both of these components of the case plan.

The case record review process revealed that although case plans are completed for all children, in 40 percent of cases reviewed, parents did not participate in a case planning process. Instead, the common pattern for these cases was for the worker to complete the case plan and then present it to parents for their review and signature. Some stakeholders commenting on this issue suggested that families are routinely involved in developing the Family/Child Strengths and Needs Assessment component of the case plan, but not the Treatment Plan component.

Information from the Statewide Assessment and from interviews with stakeholders indicated that DHS makes diligent efforts to address any problems that arise with respect to components of the case plan. For example, judges recently requested that the treatment plan be revised because foster parents, parents, and external providers often find the format of the treatment plan difficult to understand. A KIDS enhancement was released in October 2001 that allows the worker to print a simplified version of the treatment plan. In addition, an advisory committee is being formed to assess the format of the treatment plan and to suggest improvements.

In general, the information obtained through the CFSR suggests that while the State has established policy regarding parent involvement and completion of components of the case plan, this policy is not always followed in practice. Information from stakeholder interviews suggests that a major reason why policy may not be implemented in practice is the high level of staff turnover among child welfare agency workers, and the excessive caseloads that often result from frequent staff turnover. Consequently, staff are not only relatively inexperienced, but also overburdened. Interviews with stakeholders also indicated that DHS is aware of both the problem of non-compliance with policy and of overburdened and inexperienced staff and has been undertaking various efforts to address both of these problems.

Item 26. Provides a process for the periodic review of the status of each child, no less frequently than once every 6 months, either by a court or by administrative review.

☒ Strength ☐ Area Needing Improvement

This item was rated as a Strength because, according to the Statewide Assessment and information from stakeholders, DHS has established a number of procedures to ensure a review of the status of each child in foster care every 6 months. One procedure is the Permanency Planning Review (PPR). DHS policy requires that the PPR must take place every six months for as long as a child remains in out of home care and parents are to be invited to participate. The PPR is a multidisciplinary review process and the review

team may include the child's worker, the case supervisor, the adoption specialist, any private providers, the child's foster or adoptive parent, service providers, the Court Appointed Special Advocate (CASA), guardian ad litem, a Post Adjudication Review Board (PARB) member, the child's attorney, District Attorney (DA), birth parents and, in some instances, the child. The team identifies barriers to permanent placement and proposes and implements solutions to those barriers.

As noted in the Statewide Assessment, a customer satisfaction survey with parents was conducted as a component of the PPR facilitation pilot. Final survey results for State Fiscal Year 2001 indicated that families believe that the PPR helps them plan for a permanent home for their children even though the children are not able to live at home, and that the process is a comfortable way to work out disagreements with the treatment plan or recommendations from the meeting.

In addition to the PPR, Oklahoma statutes require that a judicial review hearing be conducted at least once every six months after the dispositional hearing. According to the Statewide Assessment, this procedure is perceived as adequate by both internal and external stakeholders. The primary issue identified as problematic is that some cases are not adjudicated in a timely manner. There are two main reasons why the delays happens. One reason is that under Oklahoma statute, parents have the right to request a jury trial at the point of case adjudication. Another reason is that, as a practice of law at the discretion of the local District Attorney, a case may not be adjudicated if there is a pending criminal case resulting from the child maltreatment incident.

The Statewide Assessment also noted that an Administrative Review is held when a case involving a child placed in out-of-home care, or a youth age 18 - 21 receiving voluntary foster care from the Department, has not been reviewed after a six month interval by the Court of Jurisdiction or the Post Adjudication Review Board (PARB). This review is open to the participation of the parents of the child and is conducted by a panel with at least one member who is not involved in service delivery to the child or family.

Another review is conducted by the Post Adjudication Review Board (PARB), which holds 6-month reviews of all children in foster care prior to the court review hearings and uses a coordinator to set up the meeting. The Statewide Assessment noted that all relevant parties are invited to participate in the PARB.

There was general agreement among stakeholders that all required 6-month reviews are being held on time. In one county, stakeholders noted that cases may be reviewed as frequently as every 90 days. However, many stakeholders expressed the opinion that some of the reviews are not as useful as they should be in moving children toward permanency. For example, some stakeholders noted that the Permanency Planning Review meetings are not helpful because most of the people who are invited do not attend. These stakeholders viewed Family Group Conferencing as a more promising practice for reviewing cases and engaging both parents and other key people in achieving permanency for a child in a timely manner. Other stakeholders, while agreeing that the PARB reviews

can be useful because they occur just prior to the court hearing, expressed concern about whether the county agencies were using the PARB recommendations effectively.

Item 27. Provides a process that ensures that each child in foster care under the supervision of the State has a permanency hearing in a qualified court or administrative body no later than 12 months from the date the child entered foster care and no less frequently than every 12 months thereafter.

☐ Strength ☒ Area Needing Improvement

This item was assigned a rating of Area Needing Improvement based on findings reported in the Statewide Assessment regarding permanency hearings. According to the Statewide Assessment, Oklahoma statute requires that permanency hearings be held no later than 12 months after a child is placed in out-of-home care. However, data from KIDS indicate that less than 1 percent of the children in out-of-home placement have had a permanency hearing as per statute; 27 percent of the children have had a permanency hearing, but not within the time frames required by statute; and 73 percent of the children have no information entered into KIDS regarding a permanency hearing. As noted in the Statewide Assessment, the agency has been unable to determine whether this problem is due to poor data entry, to the fact that no Permanency Hearing has been held, or to the lack of court documentation of a permanency hearing having been held.

Information from stakeholder interviews suggests that the data from KIDS may reflect poor data entry rather than failure to hold permanency hearings. All stakeholders commenting on this issue expressed the opinion that permanency hearings were being held in a timely manner and that there were very few continuances. One problem identified by stakeholders is that the 12-month permanency hearing is not as formal as it needs to be, with appropriate issues being discussed and with court minutes provided. Judges interviewed during the onsite review said that all of the hearings they convene focus on permanency issues and they are working to formalize “minutes” of permanency hearings.

According to the Statewide Assessment, Oklahoma statute also requires a mandatory meeting of all parties prior to the Permanency Hearing. This meeting is combined with the ongoing PPR held when the child has been in out-of-home care for 12 months. During the meeting a report is developed which contains the permanency plan for children and is submitted to the court. Stakeholders did not comment on this procedure.

Item 28. Provides a process for termination of parental rights proceedings in accordance with the provisions of the Adoption and Safe Families Act.

☒ Strength ☐ Area Needing Improvement

This item was rated as a Strength because Oklahoma State statute and DHS rules comply with the ASFA requirement for filing TPR petitions within 15 of 22 months, absent one of the three exceptions. According to the Statewide Assessment, the State-administered CFSR indicates compliance with the ASFA requirement in 88 percent of the cases. However, results from the State-administered CFSR process also suggest that ASFA requirements regarding TPR and the filing for exceptions are not being implemented in a consistent manner across the State by either the child welfare agency workers or the courts.

The following process for consideration of exceptions to initiating termination of parental rights was described in the Statewide Assessment. DHS provides the State PARB with a listing of the children who have been in DHS custody and in out-of-home care for 15 of the most recent 22 months and identifies those children for whom the Department has determined that a petition to terminate parental rights is not required based upon an exception. The State PARB disseminates the listings to local PARBs for review. In those cases in which the local or State PARB disagrees with the Department's determination, the local or State PARB provides the District Attorney with a recommendation of additional cases for which a petition to terminate parental rights needs to be filed. The State PARB forwards a copy of the recommendation to the Department. Although a specific form was created to expedite this process, it is not being consistently used by child welfare agency staff.

The KIDS system has a screen that enables the worker to document whether TPR has been requested and filed, or whether an exception has been made. Data from the KIDS system indicates that there are 4,228 children in Oklahoma that have been in foster care for 15 months or longer during a 22 month period. Of these children, 49 percent have had their mother's parental rights terminated and 35 percent have had their father's parental rights terminated. There is no information in the system regarding 38 percent of the mothers and 36 percent of the fathers. Less than 1 percent of all cases have a determination that there are compelling reasons for not seeking TPR, or that the child is being cared for by a relative.

Stakeholders commenting on this issue were in agreement that there is a process in place for obtaining TPR that is in accordance with the provisions of ASFA. However, they also noted that there has been minimal use of the exceptions, primarily because the workers and the court do not appear to understand how they work. Stakeholders did express concern that there are many children in foster care

whose parents' rights have not been terminated even though they have been in foster care for years. Most of the stakeholders expressed the opinion that the major barriers to the timely filing for a TPR are the delays that occur when (1) there is a pending criminal trial that may result in the dependency case not being immediately adjudicated, (2) parents request a jury trial at adjudication or at TPR hearings, or (3) there is a change in worker and the new worker attempts to give parents a "fresh start."

Item 29. Provides a process for foster parents, preadoptive parents, and relative caregivers of children in foster care to be notified of, and have an opportunity to be heard in, any review or hearing held with respect to the child.

☐ Strength ☒ Area Needing Improvement

This item was assigned a rating of Area Needing Improvement because according to the Statewide Assessment, notification of foster parents, preadoptive parents and relative caregivers of reviews or hearing was not found to be occurring on a consistent basis, and there was no consistency with regard to the opportunity for these caregivers to be heard in court. In addition, Tribal representatives indicated that provision of notice to Indian families by both DHS and the Courts is inconsistent.

According to the Statewide Assessment, Oklahoma statute and DHS policy require that DHS provide prior written notice of any hearing to the current foster parents of the child, any pre-adoptive parent or relative caring for the child, and the child's guardian ad litem. A notice of hearing is to be sent out by the assigned worker no later than seven calendar days prior to the hearing. The Statewide assessment also noted that 94 percent of the external stakeholders interviewed during the State-administered CFSR process expressed the opinion that the notification process is adequate. However, twelve sites across the State have indicated that both the notification process and the opportunity to be heard in the Court are not occurring or are occurring on an inconsistent basis. It was noted in the Statewide Assessment that DHS plans to increase the consistency of the notification process through an enhancement to KIDS that will automatically build the notice when a worker enters the hearing date. The date of the next hearing will be on the Placement Provider Information Report that is given to new providers upon placement of the child. Automating the form will increase compliance with the written notice requirement.

Stakeholders interviewed during the Federal CFSR process expressed differing opinions regarding the adequacy of the hearing notification process. Several stakeholders expressed concern that all parties may not consistently receive notification of hearings. Foster parents indicated that sometimes they received notices and sometimes they did not. Also, they noted that receiving notification just one week prior to the hearing did not give them sufficient time to arrange their schedules and the children's schedules.

Stakeholders also expressed mixed perceptions regarding whether foster parents, pre-adoptive parents, and relative caregivers are permitted to have a voice in court. Some foster parents indicated that when they appear in court, their input is solicited, and, in one county, when they did not appear in person they were able to submit their opinions in a written report. Other stakeholders, particularly those participating in the Tribal focus groups, indicated that there are judges who will not allow foster parents to be heard in court.

Stakeholders agreed that in many courts, CASAs are permitted to have input at hearings. However, it was noted that only 25 percent of the children needing a CASA have one.

VI. QUALITY ASSURANCE SYSTEM

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2	3	4X

STATUS OF QUALITY ASSURANCE SYSTEM

Oklahoma is in substantial conformity with the factor of Quality Assurance System. Findings with respect to the specific items assess for this factor are presented below.

Item 30. The State has developed and implemented standards to ensure that children in foster care are provided quality services that protect the safety and health of the children.

 X Strength Area Needing Improvement

This item is rated as a Strength because according to the Statewide Assessment, DHS has developed standards to ensure that children in foster care are provided quality services that protect the safety and health of children. For one, DHS approves foster and kinship homes that meet the requirements of the Oklahoma Child Care Licensing Act and the rules, standards and policies established by the Children and Family Services Division (CFSD). CFSD has standardized forms for the assessment, approval and monitoring processes

of foster and kinship homes. DHS re-assesses each foster or kinship home 24 months after initial certification and every 24 months thereafter. A home visit is made at the time of the re-assessment to review and discuss foster care policy, the responsibilities of the foster or kinship family, and the responsibilities of the Child Welfare worker. New placements of children are not made in a foster home when there is no current assessment in the foster home record.

In addition, DHS policy requires any injury to a child in a foster or kinship home involving the face, head, neck, stomach or genitals; burns, broken bones, deep bruises or wounds or any type of injury requiring medical attention to be immediately reported, even if accidental. When a child abuse or neglect report regarding a foster or kinship home is received, the investigation is completed within 10 working days. The decision to remove a foster or kinship child when a report of suspected child abuse or neglect is received is made by the agency worker and supervisor, Child Welfare Field Liaison, or County Director. If a CPS investigation or assessment of abuse or neglect in a foster or kinship home or an evaluation reveals that rule violation(s) have occurred and issues are identified which require remediation, a written plan of compliance is initiated (unless the home is closed immediately).

Another standard established by DHS is that each child in State custody is to receive an EPSDT examination in keeping with the recommendations of the American Academy of Pediatrics. This includes six screenings during the first year of life; two screenings in the second year; one screening yearly for ages two through five years; and one screening every other year for ages six through 20 years. Well-child checkups are required during those years in which there is no EPSDT required check up. Although this is established State standard, data from both the State-administered and the Federal-administer CFSR processes indicate that this policy requirement is not being followed on a consistent basis.

In addition to standards for the foster homes, the State has established contracts with services providers that include extensive performance standards to ensure the quality of services.

Stakeholders were in general agreement that the State has sufficient standards in place. However, there were some stakeholders and case record reviewers who expressed concerns about the quality of some of the foster home placements.

Item 31. The State is operating an identifiable quality assurance system that is in place in the jurisdictions where the services included in the CFSP are provided, evaluates the quality of services, identifies strengths and needs of the service delivery system, provides relevant reports, and evaluates program improvement measures implemented.

☒ Strength ☐ Area Needing Improvement

This item was rated a Strength because the State operates a quality assurance system that is comprehensive and meets all of the requirements for a Strength rating. As noted in the Statewide Assessment, Oklahoma is one of only two State child welfare agencies accredited by the Council on Accreditation. Accreditation has required the development of many systems of practice supporting the realization of desired outcomes for children and families engaged in child welfare services. These practices include the implementation of a comprehensive quality improvement/quality assurance system.

In January 2001, DHS implemented a statewide quality improvement system incorporating many features of the Federal CFSR process. The State has integrated these CFSR outcomes into goals constituting the State's title IV-B, Child and Family Services Plan. The Annual Program and Services Report includes a critical evaluation of performance in the context of goals as well as strategies for ongoing service improvement.

The State CFSR process examines outcomes related to safety, permanency, and well being for a random sample of children served in a given county. Assessments are completed by a three-person team, led by a staff member from the State agency's Continuous Quality Improvement (CQI) Unit. Outcome conformance is assessed through record reviews as well as interviews with the children, family members, child welfare specialist and others with significant roles in planning or services. Systemic factors are assessed through interviews with internal and external stakeholders in the community. Over the course of the year, more than 1250 stakeholders were interviewed regarding systemic functioning. A written and oral summary of findings is provided to County and Area Managers at the conclusion of each review. Outcome based practice is being further reinforced by supervisors who are adopting the CFSR instrument to serve as a tool for ongoing case review. Many supervisors have initiated this procedure on a voluntary basis, and effective December, 2001 one of the six Areas will formalize the incorporation of CFSR protocols into on-going supervisory reviews.

In addition to the review process, CQI staff are assigned to each DHS Area to provide on-going support to service improvement activities. CQI staff work with local personnel to confirm priorities for service improvement, develop strategies for measuring change, and collaborate on factors that are barriers to desired performance. CQI staff follow up with local offices to assess the impact of local initiatives at intervals determined appropriate given the scope of projected change.

An additional quality assurance and improvement activity involves the solicitation of opinions from children, families, providers, staff and other stakeholders through surveys that address practices related to the attainment of specific outcomes. Surveys are mailed to a random sample of 300 children, 300 families and 100 providers each month and distributed to stakeholders at meetings and conferences. The distribution of surveys to 75 staff per month began in November, 2001. Responses are tabulated quarterly and disseminated. Respondents requesting follow up or expressing a concern with regard to safety are contacted by a representative of the CQI unit or by field office staff as appropriate.

All stakeholders agreed that DHS has a very strong quality assurance and improvement unit and that ongoing quality assessment is an integral part of State agency operations. In addition, stakeholders noted that DHS frequently contracts with third party evaluators to conduct methodologically rigorous evaluations testing the efficacy of any new program, pilot project, or service initiative. Although this is an expensive process for the agency, the agency is committed to ensuring that the services being implemented are effective for attaining the desired goals and outcomes.

Stakeholders also noted that in one county a Case Analysis Review System has been implemented. This system involves a regular review of a percentage of cases with supervisors and workers together to examine practices in those cases.

Despite the highly positive perceptions of the quality assurance system and evaluation efforts in general, a few stakeholders did raise concerns about whether the results of all these activities are getting down to the worker level and whether supervisors and caseworkers are able to make real changes based on the findings.

VII. TRAINING

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2	3	4X

STATUS WITH RESPECT TO TRAINING

Oklahoma is in substantial conformity with the systemic factor of Training. Findings with respect to items assessed for this factor are presented below.

Item 32. The State is operating a staff development and training program that supports the goals and objectives in the CFSP, addresses services provided under titles IV-B and IV-E, and provides initial training for all staff who deliver these services.

 X Strength Area Needing Improvement

Item 32 was rated as a Strength because according to information provided by stakeholders and by the Statewide Assessment, the Oklahoma DHS operates a staff development and training program that supports the goals and objectives in the CFSP, addresses services provided under titles IV-B and IV-E, and provides initial training for all staff who deliver these services.

As noted in the Statewide Assessment, DHS operates the Child Welfare Comprehensive Training Program, which provides a variety of training, educational and support services to Child Welfare workers and supervisors, county directors, and other DHS staff. Included in the Comprehensive Training Program is the New Child Welfare Worker Development Plan, which is a structured program that covers approximately the first 8 months of employment. DHS policy requires that all new child welfare agency staff attend the 5-week CORE training before receiving a caseload. CORE is a competency based training program that consists of 126 hours of training, presented in 5 weeks with 9 modules. Each new worker completes 90 additional hours of mandatory training within six months of completing CORE. DHS policy requires that a mentor be assigned to all new workers at the beginning of employment. Supervisors also are required to provide intensive supervision of new workers throughout the CORE Training and for six months thereafter.

The training program has a continuous quality improvement process that solicits feedback from participant evaluations and review sessions held at each Bi-Annual Supervisors' Meeting. The agency then acts on that feedback in making revisions to the training. For example, in one evaluation of CORE participants, new workers expressed the opinion that they learn a lot about policy but do not receive sufficient information about the Indian Child Welfare Act (ICWA) or other legal issues or about permanency planning and writing treatment plans. In response, workshops on advanced permanency planning policy, ICWA and legal training were offered as some of the mandatory workshops to be completed within six months after CORE.

Although training workshops after CORE are mandated, the Statewide Assessment indicated that it has been a challenge for new staff to participate in the workshops seven times within the six month period after CORE because they are carrying full caseloads at that time. To address this problem, a new policy will be implemented beginning in July 2002 that extends the time frame for completion of the mandatory training from 6 months to 12 months, thus spreading out the days new staff are away from the office. In addition, new technology is being explored to develop an interactive electronic classroom so that staff can participate in training from the

county offices. The goal is to offer the first such class in 2003.

Stakeholders commenting on this issue, including workers who had received the training, were generally positive about the training. They also confirmed the Statewide Assessment report that most staff receive training within 30 days of being hired, and noted that staff do not receive a caseload until they complete the CORE training. The key concern identified by a few stakeholders was that the training provides new workers with a comprehensive overview of the system but it does not adequately prepare them to actually do the work.

Another concern was expressed by stakeholders from the Indian nations. Although the training is offered to staff of Indian Child Welfare agencies "if there is space," Tribal representatives noted that there are only a few slots for Tribal workers.

Item 33. The State provides for ongoing training for staff that addresses the skills and knowledge base needed to carry out their duties with regard to the services included in the CFSP.

☒ Strength ☐ Area Needing Improvement

Item 33 was rated as a Strength based on information from the Statewide Assessment and from stakeholders indicating that DHS provides numerous opportunities for ongoing training that addressed the skills and knowledge base needed by staff to carry out their jobs and that this training is mandated for all workers.

According to information provided in the Statewide Assessment, training topics are selected through feedback from supervisors and child welfare training program staff. Most of the specialized ongoing training is mandatory. The intermediate skills workshops, which are divided into tracks that reflect the worker's job responsibilities, must be completed within 24 months of completion of the CORE training. Workshops focusing on more advanced skills are offered for experienced workers to meet the requirements of a minimum of 40 hours of job-related training per year.

Information from the State-administered CFSR process indicated that many staff members perceive the current specialized training offerings as repetitive. Consequently, in SFY 2000, 11 new workshops were added for a total of 36 different topics. In SFY 2001, three new workshops were added, and a Substance Abuse Level II workshop was made mandatory for all staff. A total of 38 different workshops were offered in SFY 2001, and 11 new topics have been added for SFY 2002.

Agency stakeholders interviewed during the Federal CFSR had mixed opinions regarding ongoing training offerings. Some staff members said that ongoing training is helpful when they can attend, but others reported that it is repetitive and not "cutting edge." In addition, some workers noted that supervisors discourage attendance and see it as an inconvenience to have workers out at training.

The DHS Child Welfare Training Program also includes a Sexual Abuse Specialist certification. Specialists respond to the most complex cases or provide consultation to the worker assigned to the case. In rural counties, the specialists are often called on by local law enforcement to assist with the child interviews. In all but a few counties, the specialists are considered as expert witnesses in court. Results of a survey sent to Child Welfare Supervisors and County Directors were very positive regarding this effort and stakeholders who commented on this program during the Federal CFSR also viewed the program as very positive.

DHS also offers ongoing on-the-job training to supervisors through the establishment of case management groups. The purpose of these groups is to enhance agency practice by providing a venue in which clinicians with Master's Degrees in social work (MSWs) can provide assistance to agency supervisors in making decisions in complex cases. Each supervisor is required to attend a minimum of seven sessions per year and receives two hours of Supervisor Management Training credit for each session attended. As noted in the Statewide Assessment, a survey conducted in May 2001 revealed that supervisors are generally very positive about the value of this service and about the expertise of the MSW clinicians assigned to their group. Information from stakeholder interviews during the Federal CFSR was consistent with the survey findings, as administrators and supervisors indicated that this process is extremely helpful and supervisors look forward to their group meetings.

Another training effort operated by DHS is the ***Master of Social Work Scholarship Program***, which is designed to increase the level of MSW supervision within child welfare. According to the Statewide Assessment, this program is funded largely by title IV-E training dollars and is a collaborative effort with the University of Oklahoma School of Social Work. The full scholarship allows the employee to attend school full-time while receiving full salary and benefits. Tuition and fees also are paid. The partial scholarship pays the employee's tuition, fees, books and certain travel expenses. The employee maintains his or her full-time job and attends school part-time for two years and full-time for the third and final year. The partial scholarship repayment is six months work per semester of educational support. The full scholarship repayment is 12 months work per semester of educational support. Since the program was initiated in 1993, there have been 57 graduates with MSW degrees. At this time, 43 are still employed with DHS. Fourteen (14) are supervisors and 16 are Field Liaisons, County Directors or CFSD program staff. The remainder are front-line workers. While most stakeholders perceived this program as benefiting both staff and administrators, workers expressed concern about the additional cases that were added to their caseloads whenever someone in the program was on leave to attend school.

Several stakeholders commenting on the issue of ongoing training noted that the most effective ongoing training is strong supervision by highly skilled supervisors. Many stakeholders noted that there needs to be more mentoring of staff and that strong supervision and mentoring were critical to addressing the problem of staff turnover.

Item 34. The State provides training for current or prospective foster parents, adoptive parents, and staff of State licensed or approved facilities that care for children receiving foster care or adoption assistance under title IV-E that addresses the skills and knowledge base needed to carry out their duties with regard to foster and adopted children.

☒ X Strength ☐ Area Needing Improvement

Item 34 was rated as a Strength because, according to the Statewide Assessment, DHS policy and/or contractual agreements require foster and kinship applicants to complete 21 hours of the Oklahoma PATH (Parents as Tender Healers) curriculum and 6 hours of Behavior Crisis Management Training (BCMT). For continued certification, 12 hours of in-service training are required per contract year. Both training programs are managed through a contract with the National Resource Center for Youth Services. A total of 3,410 individuals were trained in Oklahoma PATH and 2,852 individuals in BCMT in SFY 2001. In-service training is provided to resource families through satellite, local county offices, videos, books and Internet.

As noted in the Statewide Assessment, the evaluations completed by participants indicate that families view both training experiences as beneficial. The participating families expressed the opinion that BCMT, in particular, has provided them with important insights on what to expect when children are placed in their care. Many individuals commented that they wished they had received the training prior to raising their own children. Another consistent theme emerging from the evaluations is the participant's perceptions of the trainers as being of high quality.

Results of a survey sent to resource families indicated the need for new in-service training opportunities. In SFY 2002, eleven new topics identified from the survey were added and the in-service schedule was developed. A video library is being developed for resource families in each local office. A video is being developed that will include information and instructions on medical benefits, visitation policy and procedures, the court process, the grievance process, and child care procedures. Although this is not intended to replace the regular visits by a DHS worker, the Department believes that it will address the most frequently cited concerns of foster families.

The Statewide Assessment also reported that an Internet site, Fosterparents.com, has been made available for families who have access to a computer. After completing a lesson on-line, the individual receives a certificate and in-service training credit.

Most stakeholders expressed positive opinions about the PATH and BCMT training and about opportunities for ongoing training for foster parents, although several indicated that it is difficult for foster parents to attend training because no child care is available. Several foster parents commented on the usefulness of the Internet site as a training venue and also noted that they access training that is available in the community if it is focused on what they believe they need. It also was noted that training is desperately needed on how to effectively parent children who have been diagnosed as ADHD or bipolar.

According to the Statewide Assessment, training for employees of residential child care agencies is required by the Oklahoma Child Care Facilities Licensing Act. The hours and topics of required training vary depending upon the employee's classification. Administrators, program directors, and social service staff members must obtain a minimum of 12 hours of continuing education per calendar year. Child care staff must receive a minimum of 24 hours of training. Within 30 days of employment, all child care staff must complete training in behavioral intervention techniques. No stakeholders commented on this issue.

VIII. SERVICE ARRAY

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2X	3	4

STATUS WITH RESPECT TO SERVICE ARRAY

Oklahoma is not in substantial conformity with the systemic factor of service array. Findings pertaining to the specific items relevant to this factor are presented and discussed below.

Item 35. The State has in place an array of services that assess the strengths and needs of children and families and determine other service needs, address the needs of families in addition to individual children in order to create a safe home environment, enable children to remain safely with their parents when reasonable, and help children in foster and adoptive placements achieve permanency.

 X Strength Area Needing Improvement

Item 35 was rated as a Strength because the State has available and in place an array of services that assess the strengths and needs of children and families and determine additional services needs. According to the Statewide Assessment, DHS has strength in its service array and resource management. DHS provides many services directly, such as casework services, family support, emergency shelter, and placement services. Placement services include emergency foster care, therapeutic foster care, and in-patient and residential treatment. DHS also purchases a number of services for the children in DHS custody and their parents.

The Statewide Assessment also noted that the State has programs that assist with all different levels of prevention including primary, secondary and tertiary programs. One of the key services provided is through Oklahoma Children's Services (OCS), a statewide program that provides pre- placement preventive services and reunification services. Comprehensive Home-Based Services CHBS), a component of OCS, offers specific home-based child welfare services and incorporates existing community services and resources through a partnership of contract case managers and child welfare agency staff. Services are culturally competent and linguistically appropriate. The standard service period is six months.

The Statewide Assessment also noted that beginning in SFY 2002, the CHBS program will be redesigned to better address the risk factors that most significantly impact subsequent referrals. A "best practices" approach is being used to guide the development of the program. A model program has been selected based on stakeholder input and collaboration with independent program evaluators, and other State and private agencies. This model has empirical support for its effectiveness in reducing subsequent reports of suspected child maltreatment and is especially effective with neglect issues. The model program, based on Project SafeCare in California, will be piloted in two areas of the State and will be evaluated and compared with a control group receiving an improved version of current OCS services.

According to the Statewide Assessment, DHS also operates a high quality Independent Living (IL) Program. There are two major components of Oklahoma's IL services: contracted services through OCS, including life skills assessments, life skills development and training, transitional living and supervised practice living; and, the Chafee Foster Care Independence Program, which focuses on education, job and career planning, and independent living training.

Additional services include Developmental Disabilities Services (DDSD), Family Centered Services, and Family Preservation Services through the Promoting Safe & Stable Families (PSSF) program. Eighteen Tribal PSSF projects developed and operated by various Tribes offer services such as parenting education, parent aides and direct client services. However, there is a lack of services for developmentally disabled children and a lack of individualized services to meet the needs of these children.

Stakeholders commenting on this issue generally agreed that there was a broad array of services available, particularly in the metropolitan county. Services that were perceived as insufficient in the State were residential substance abuse treatment services for mothers and their children and for adolescents, mental health services in general, treatment services for domestic violence and sexual abuse perpetrators, services for Native Americans provided by Native Americans, and services for children with developmental disabilities. With respect to the latter services, stakeholders noted that children and families often wait years to receive needed services.

There also was general agreement among stakeholders that there is a need Statewide for a greater variety of placement resources, particularly therapeutic foster homes for children. The paucity of therapeutic foster homes was noted to promote frequent placement changes because children who are placed in residential treatment facilities, often are quickly discharged because they do not need that level of care. Similarly, children who are placed with foster families that cannot cope with their problems end up back in emergency shelters because the foster parents request that they be removed immediately. This problem was perceived as resulting in a pattern of children moving in and out of shelter care, which was a pattern that also was observed among children in the case records reviewed.

Many stakeholders expressed the opinion that it was difficult to obtain services for in-home services families because of the complexities of the managed care system. It was noted that often the referring doctor may not order the services that are appropriate to the needs of the family and individual. One stakeholder shared an incident in which a doctor had ordered four counseling sessions for a sexual abuse perpetrator. In addition, in one of the case records reviewed, a woman who had been diagnosed with depression, had been referred for counseling services without attention to the possibility of her need for medication. Stakeholders also suggested that it was equally difficult to obtain services for children in foster care because there were few providers, particularly doctors and dentists, who will accept Medicaid payments.

Only a few stakeholders commented on the DHS Independent Living Program services. These stakeholders suggested DHS does not do a good enough job preparing children for independent living, and while there are some good programs being implemented, they serve only a limited number of youth.

Stakeholders identified a few services that they perceived as particularly noteworthy. These included a mental health service center in one county, a substance abuse treatment pilot program for women and children in another county, and a Oklahoma Lawyers for Children Program, which helps find attorneys to represent children on a volunteer basis.

Item 36. The services in item 35 are accessible to families and children in all political jurisdictions covered in the State's CFSP.

☐ Strength ☒ Area Needing Improvement

This item was rated as an Area Needing Improvement because of the wide variation across the State with respect to the availability of key services to children and families. As noted in the Statewide Assessment, the array of child protective, permanency planning, and adoption services are provided in all county child welfare agency field offices, with an office located in all of the State's 77 counties. However, the Statewide Assessment also indicated that Oklahoma is a largely rural State and that families residing in rural areas are dependent on transportation to larger metropolitan areas for many services. In addition, many rural communities cannot recruit professional mental health and medical staff willing to locate to their areas. OCS, through its multiple community contracts, is able to provide general and comprehensive services in all areas of the State, but many of the contractors in more rural communities experience recruitment challenges, resulting in high levels of staff vacancies. In many rural areas of the State, the CHBS and IL services for youth, both components of OCS, are the only treatment services available.

Stakeholders' perceptions of the availability of services varied depending on the county in which they were located. Stakeholders in the urban county expressed the opinion that there is a wide array of services and that waiting lists for services are rare. In contrast, stakeholders in the more rural counties identified several service gaps, noted that families often have to travel long distances to obtain services, and expressed concern about long waiting lists, especially for mental health services and residential treatment. In one county, stakeholders were particularly concerned that children had to travel a long distance to get examinations for child abuse or sexual abuse.

Item 37. The services in item 35 can be individualized to meet the unique needs of children and families served by the agency.

☐ Strength ☒ Area Needing Improvement

Item 37 was rated as an Area Needing Improvement because the State did not always provide individualized services to families, particularly in-home services cases, as required by DHS policy. According to the Statewide Assessment, the ability to individualize

services to meet the unique needs of children and families is a strength of the State child welfare agency. DHS policy requires that workers assess the family's strengths, needs, and resources and that this assessment serve as the basis for developing individualized goals and service delivery to meet the family's unique service needs, whether the child is placed out of home or receiving in-home services. The family is the primary source of information for the assessment with emphasis on partnership with the family in context with their circumstances. The child and family treatment plans, though continuously modified for improvement, are routinely utilized as an effective case management tool. PPT reviews or administrative reviews provide family and stakeholder involvement in the process.

Although this is DHS policy, case record reviews indicated that the policy is not always implemented in practice. For example, in a large percentage of the case records reviewed, families were not involved in the development of their case plans or treatment plans, and in many cases the service availability appeared to drive the treatment plan rather than the reverse. For example, a mother who had been diagnosed with depression and who was having difficulty meeting her children's needs as a result of her depression was offered parenting classes and once-a-week counseling.

Some stakeholders commenting on this issue also expressed the opinion that in many cases of child maltreatment, particularly in-home services cases, the agency response is to provide standard services such as parenting classes and counseling rather than adopting a more individualized service approach. However, some stakeholders noted that access to CHBS enhances the ability of the agency to individualize services because CHBS, as a home-based services program, allows identification of a variety of unique family and child needs.

IX. AGENCY RESPONSIVENESS TO THE COMMUNITY

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2	3	4X

STATUS OF AGENCY RESPONSIVENESS TO THE COMMUNITY

Oklahoma is in substantial conformity with the systemic factor of Agency Responsiveness to the Community. Findings with regard to the specific items assessed for this factor are presented below.

Item 38. In implementing the provisions of the CFSP, the State engages in ongoing consultation with tribal representatives, consumers, service providers, foster care providers, the juvenile court, and other public and private child- and family-serving agencies and includes the major concerns of these representatives in the goals and objectives of the CFSP.

☒ Strength ☐ Area Needing Improvement

This item has been rated as a Strength because the State engages in extensive consultation with tribal representatives, consumers, service providers, foster care providers, the juvenile court and other relevant public and private agencies in developing and establishing the goals and objectives of the CFSP.

According to the Statewide Assessment, during 2001, Oklahoma implemented systems that provide multiple opportunities for stakeholder involvement in both service evaluation and planning. Over 1250 internal and external stakeholders participated as reviewers or respondents in the State-administered CFSR during 2001. In addition, the CFSR process includes focus groups with various Tribal representatives to obtain input on their concerns and needs with respect to serving Native American children in the Oklahoma and Tribal child welfare systems. Findings from each County and Area CFSR review are shared with, and acted upon, by local administrators and tribal representatives. Issues that emerge across locales are tracked and presented to State Office program staff for action. Findings from these reviews are presented to the Child and Family Services Committee as data addressing the realization of CFSP outcomes.

The Statewide Assessment also identifies the Child and Family Services Committee as another DHS initiative designed to engage in ongoing consultation with the community. The Child and Family Services Committee, which was impaneled by DHS to assist in the State's evaluation of outcomes and systemic performance, is comprised of representatives from Tribal groups, the legislature, service provider agencies, educational advocacy organizations, DHS, and other State agencies.

In order to further expand opportunities for stakeholder input into the service improvement process, Oklahoma implemented surveys of children, families, and providers in March 2001. Instruments tailored to specific audiences are distributed to a random sample of 300 children, 300 families and 100 providers per month. Additional surveys have recently been created and distributed to staff and other stakeholders. To date, responses have been received from 133 children, 77 parents, 170 providers, and 89 stakeholders.

Stakeholders were unanimous in their praise for the efforts made by DHS to engage in ongoing consultation with the community and to seek input from the community and act on that input. Most stakeholders noted that there was extensive involvement of the community in preparing for the CFSR and that it is expected that this involvement will be maintained through the development of the IV-B plan.

One area of concern with respect to responsiveness to the community concerned the courts. A few stakeholders expressed the opinion that there is a need for more extensive interaction with the court system, District Attorneys, and juvenile judges in several jurisdictions in the State. Stakeholders at the State level also indicated a need for DHS to coordinate with the Court Improvement Project. In general, stakeholders commenting on this issue suggested that judges were not sufficiently knowledgeable about the need for permanency for children and the importance of expediting the adoption process.

Although stakeholders indicated that there were generally good relationships between DHS and the Tribes, a few problems were identified. One problem noted by tribal representatives was that the DHS tribal liaisons are not as helpful as they could be in facilitating coordination and collaboration. However, in one county, stakeholders noted that five tribes in the area have a child protection team and the DHS tribal liaison is a member and attends the meetings.

The Tribal-DHS relationship was noted to be negatively impacted by the concern of many DHS workers regarding the quality of the foster parent homes licensed by the Tribes. Because the Tribes do not have the same standards for licensing as the State, DHS workers often are reluctant to place children in the Native American homes. Several stakeholders indicated that this creates conflicts between the agency and the Tribe that is a barrier to more effective service coordination.

Finally, although it was not a major discussion topic during the stakeholder interviews, there was at least one stakeholder at each site who indicated that DHS does not always respond appropriately to personnel issues that arise regarding the behaviors of particular DHS staff members, even when the community complains.

Item 39. The agency develops, in consultation with these representatives, annual reports of progress and services delivered pursuant to the CFSP.

☒ Strength ☐ Area Needing Improvement

This item has been rated as a Strength because, as noted in the discussion of the prior item, the State-administered CFSR process, which reflects the increasing emphasis of DHS on continuous improvement of child welfare services, uses consultation with the community representatives to inform annual reports of progress and services delivered under the CFSP. Similarly, DHS uses the Child and Family Services Committee to ensure that input from other stakeholders in the community is ongoing and used to guide the development of reports of progress.

In the future, the Child and Family Services Committee will include a focus on planning for service improvement. The Committee will review the CFSR Final Report as well as Oklahoma's evaluation of practice implementing goals in the Child and Family Services Plan. In addition, the Committee will review and contribute to strategies to achieve service improvement that addresses the needs identified in these evaluative processes. These strategies will be incorporated in both the State's Program Improvement Plan and the FFY 2002 Annual Progress and Services Report.

Finally, the Statewide Assessment noted that although DHS has a long history of constructive relationships with the Tribes, there is an identified need to significantly improve the State's ICWA conformance. The Statewide Assessment identified inconsistent practices with regard to the early identification of Native American status, Tribal notification of hearings or the results of court proceedings, and efforts to secure culturally appropriate services. The tribes have offered many constructive recommendations included in this report and in supplemental planning initiatives.

Item 40. The State's services under the CFSP are coordinated with services or benefits of other Federal or federally assisted programs serving the same population.

☒ Strength ☐ Area Needing Improvement

This item was rated as a Strength because at DHS, participation with other public and private agencies is an integral part of planning, developing and coordinating services. Consequently, DHS participates in wide range of councils and organizations in the community and partners with a variety of agencies, including the Casey Family Program, Oklahoma City Division, the Oklahoma State Department of Health (OSDH), One Church, One Child of Oklahoma, and the Office of Juvenile Affairs (OJA).

The Statewide Assessment also noted that DHS has numerous agreements and Memorandum of Understanding with 30 of the 39 federally recognized Tribes in the State. With regard to Federal programs, the Department contracts with 18 of the federally recognized tribes in Oklahoma to provide services under the Federally funded PSSF program. Each tribe provides specific services, including parenting classes, parent aide services, family crisis interventions, foster care recruitment, and mentoring services. However, stakeholders noted that there is a need for both inter-tribal and Tribal child welfare - DHS coordination of services in all of the counties.

Data collected and reported indicate that the Department's coordination of services with other public or private agencies serving the same general population is good. However, Tribal representatives have expressed concern that Native American children are not always identified and that Tribes are not always notified of child abuse or neglect investigations or assessments or of the delivery of preventive services. Tribal representatives also expressed concern regarding the reluctance of Department's staff to refer custody children for placement in tribal foster homes because of disagreement with tribal standards for approval.

Stakeholders commenting on this issue noted that there is a strong partnership between child welfare services and the Temporary Assistance to Needy Families (TANF) program. The collaboration between these programs has resulted in an assisted guardianship program that uses TANF funds to provide support to relatives who assume guardianship over children who are in State custody.

X. FOSTER AND ADOPTIVE PARENT LICENSING, RECRUITMENT, AND RETENTION

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2	3	4X

STATUS WITH REGARD TO FOSTER AND ADOPTIVE PARENT LICENSING, RECRUITMENT, AND RETENTION

Oklahoma is in substantial conformity with the systemic factor of Foster and Adoptive Parent Licensing, Recruitment, and Retention. Findings for the items pertaining to this factor are presented below.

Item 41. The State has implemented standards for foster family homes and child care institutions which are reasonably in accord with recommended national standards.

 X Strength Area Needing Improvement

Item 41 was rated as a Strength because, according to the Statewide Assessment, the State has implemented standards for foster family homes and child care institutions that are reasonably in accord with recommended national standards. Standards for foster family homes are established through State statutes and the Children and Family Services Division's rules. Since September 2000, the Department's policy has required kinship care applicants and providers, paid and non-paid, to meet the same requirements as foster care applicants and providers.

All institutions meet the statutory requirements of the Oklahoma Child Care Facilities Licensing Act as well as rules promulgated by the Division of Child Care to be licensed; licensure is required before any children can be placed. The Division of Child Care standards for Child Placing Agencies and Residential Child Care Facilities are reviewed regularly by the Child Care Advisory Committee.

The Department's Child Care Licensing staff makes an on-site monitoring visit to determine conformity with the requirements before a license is issued and makes a minimum of four on-site inspections to determine ongoing conformity with the requirements before a

license is renewed. CFSD has additional policy and contract requirements for the placement of custody children with licensed Child Placing Agencies and Residential Child Care Facilities. The CFSD CQI unit monitors these facilities for compliance with these additional requirements.

Stakeholders commenting on this issue expressed the opinion that standards are in place and reassessments are conducted every 2 years, without delays.

Item 42. The standards are applied to all licensed or approved foster family homes or child care institutions receiving title IV-E or IV-B funds.

☒ Strength ☐ Area Needing Improvement

Item 42 was rated as a Strength because the standards are applied to all licensed or approved foster family homes (both relative foster homes and non-relative foster homes) or child care institutions receiving title IV-E or IV-B funds, with the exception of homes approved by the Tribes, which establish their own standards for tribal foster homes.

Item 43. The State complies with Federal requirements for criminal background clearances as related to licensing or approving foster care and adoptive placements and has in place a case planning process that includes provisions for addressing the safety of foster care and adoptive placements for children.

☒ Strength ☐ Area Needing Improvement

Item 43 was rated as a Strength, because according to the Statewide Assessment, State statute requires that the Department or a child-placing agency shall not place a child with a foster or adoptive parent who has been convicted of any of these felony offenses: physical assault, battery or a drug-related offense in the 5 year period prior to the application date; child abuse or neglect; domestic abuse; a crime against a child, including, but not limited to, child pornography; or, a crime involving violence, including, but not limited to, rape, sexual assault or homicide, but excluding physical assault or battery.

Oklahoma State statutes and DHS require a criminal background investigation and child abuse registry check for all foster, adoptive, and kinship home applicants. Applicants and anyone age 18 years or older residing in the applicant's home cannot be approved as a foster or kinship home until the OSBI records search and FBI national criminal history search are completed. From September 1998 to October 25, 2001, the Department has submitted a total of 18,239 fingerprints (10,652 for kinship, foster and adoptive families) and

(7,587 for private child placing agencies). The background investigations include fingerprinting for a national criminal history search through the FBI for all adult members residing in the home of the applicant, a Child Abuse and Neglect Registry check, a Department of Public Safety Driver check, a check of the Sex Offender Registry and a review of the Department of Human Services records. A Juvenile Justice records review (JOLTS) is required for anyone 13 to 18 years of age residing in the home. As of January 1, 2002, background checks and fingerprinting are required every 24 months.

The Department cannot release to any tribe or agency the child abuse and neglect history of any person who is applying to be a foster parent with any agency or tribe. This results in competing values of the person's right to privacy and the safety of children in out of home placements. The CFSC recommends changes in the law to enable the Department to release the applicant's child abuse and neglect history to agencies and tribes.

Department policy has been revised to include the procedures for after hours background checks. An after hours background check for a potential kinship resource can be obtained effective January 2002 through local law enforcement when a child is placed in protective custody after 4:30 p.m. weekdays, weekends or holidays. In addition to the background check, the initial kinship placement agreement and house assessment are completed, approved and signed prior to the placement of the child. This will facilitate placement for children and, hopefully, will enhance placement stability.

Item 44. The State has in place a process for ensuring the diligent recruitment of potential foster and adoptive families that reflect the ethnic and racial diversity of children in the State for whom foster and adoptive homes are needed.

☒ Strength ☐ Area Needing Improvement

Item 44 was rated as a Strength because the State has a process for recruiting potential foster and adoptive families and attempts to recruit families that reflect the ethnic and racial diversity of children in the State for whom foster and adoptive homes are needed.

According to the Statewide Assessment, DHS realizes that in order to improve the stability and proximity of out of home placements, significant gains must be realized in foster parent recruitment and retention. Particular attention must be directed to expanding the racial and ethnic diversity of foster homes. One of the strategies the Department has implemented to increase minority recruitment is the development of a contractual relationship with the One Church, One Child (OCOC), Oklahoma program to improve the diversity of resources available for the placement of children. The Department also contracts with the United Methodist Church Circle of Care Program to recruit potential families within a wide variety of faith-based organizations and local communities, considering the racial and ethnic background of the foster care population in eight designated counties (the program is meets the requirements of

MEPA/IEPA). During the Federal CFSR process, foster/adoptive parents recruited through the United Methodist Program spoke highly of that program and the services it provides.

DHS also organizes up to four adoption matching parties each year. Each matching party is held in a different area of the State and is sponsored by community members. The matching parties result in adoptive placements for children who are often perceived as difficult to place and for large sibling groups. In calendar year 2001, 273 children attended matching parties and 72 placements resulted.

A State recruitment campaign was launched in October 2001, with two training and technical assistance workshops presented by the Spaulding National Adoption Resource Center. Over 200 foster and adoption specialists were in attendance. Samples of recruitment materials were distributed to each attendee and presentations were given by members of the recruitment task force on how to best use the varied recruitment themes designed for each quarter of the year. An additional training day was made available to the task force to allow input and discussion regarding the development of the State's joint recruitment plan.

In addition to recruiting new foster and adoptive homes, DHS is aware of the need for practices that will promote retention of existing foster and adoptive families. Retention efforts include specialized foster care training for child welfare agency foster care specialists to assist them in developing a team approach to working with foster and kinship parents that makes the foster parent feel respected and valued. According to the Statewide Assessment, foster parents in some counties report that child welfare workers do not treat them as an important part of the child's team and do not inform them of decisions made about the child's plan, court dates, and children's treatment goals. Interviews with stakeholders during the Federal CFSR revealed similar feelings among many foster parents, although foster parents in two of the counties felt that workers did value them as important members of a "team." State agency stakeholders suggested that retention has become a particularly critical problem because with dual licensing, more foster parents are adopting their foster children.

Stakeholders also noted that there is a need to recruit and train more homes as therapeutic foster homes, to prevent placement instability and ensure that children are receiving the level of care that is most appropriate for them.

Item 45. The State has in place a process for the effective use of cross-jurisdictional resources to facilitate timely adoptive or permanent placements for waiting children.

☒ Strength ☐ Area Needing Improvement

This item was rated as a Strength because according to the Statewide Assessment, Oklahoma's adoption program has historically placed children in adoptive homes Statewide. The monthly statewide staffing brings together permanency planning workers who have children available for adoption and adoption specialists with available homes. Permanency planning workers present pertinent information about children in need of adoptive homes. Adoption specialists list families that may be interested in the children and able to meet the needs of the children. Permanency planning workers leave statewide staffing with a copy of the list of families recommended. Home assessments are forwarded to the worker for review. If there are no families recommended for a child, the child is referred to the "Waiting Child" television feature and to the Swift Adoption web site. Since SFY 1999, 34 percent of adoptive placements have been made outside of the child's original county of jurisdiction.

Families from out of State with approved home assessments are encouraged to send a copy of their current approved assessment to the State office. The assessment is then forwarded to the child's worker for consideration. DHS contracts out the administration of adoption ICPC services. DHS contracts with licensed child placement agencies in receiving States for supervision of adoptive placements.

Stakeholders commenting on this issue generally confirmed the information provided in the Statewide Assessment, but also noted that adoptions that must go through the ICPC process take an extremely long time and many workers are reluctant to even begin that process.

XI. DETERMINATION OF SUBSTANTIAL CONFORMITY

For each outcome and systemic factor listed below, mark “Y” where the State is determined to be in substantial conformity and “N” where the State is determined not to be in substantial conformity. For each outcome or systemic factor marked “N,” place a check beside the performance indicator, listed by item number in this form, that has been determined to be an area needing improvement

Outcomes

I. Safety

N Outcome S1

x Item 1

x Item 2

N Outcome S2

 Item 3

x Item 4

II. Permanency

N Outcome P1

x Item 5

x Item 6

x Item 7

 Item 8

x Item 9

 Item 10

N Outcome P2

 Item 11

 Item 12

 Item 13

x Item 14

x Item 15

 Item 16

III. Child and Family Well-Being

N Outcome WB1

x Item 17

x Item 18

x Item 19

x Item 20

N Outcome WB2

x Item 21

N Outcome WB3

x Item 22

x Item 23

Systemic Factors

IV. Y Statewide Information System

 Item 24

V. N Case Review System

x Item 25

 Item 26

x Item 27

 Item 28

x Item 29

VI. Y Quality Assurance System

 Item 30

 Item 31

VII. Y Training

 Item 32

 Item 33

 Item 34

VIII. N Service Array

 Item 35

x Item 36

 x Item 37

IX. Y Agency Responsiveness to the Community

 Item 38

 Item 39

 Item 40

X. Y Foster and Adoptive Parent Licensing, Recruitment, and Retention

 Item 41

 Item 42

 Item 43

 Item 44

 Item 45

